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*Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:** : **Chapter 11**  
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**PURDUE PHARMA L.P., et al.,** : **Case No. 19-23649 (RDD)**  
:  
**Debtors.**<sup>1</sup> :  
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**EIGHTH INTERIM APPLICATION OF KRAMER LEVIN NAFTALIS & FRANKEL  
LLP, AS CO-COUNSEL TO THE AD HOC COMMITTEE OF GOVERNMENTAL  
AND OTHER CONTINGENT LITIGATION CLAIMANTS, FOR ALLOWANCE OF  
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND FOR  
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED  
FOR THE PERIOD FROM FEBRUARY 1, 2022 THROUGH APRIL 30, 2022**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant</b>	Kramer Levin Naftalis & Frankel LLP
<b>Authorized to Provide Professional Services to:</b>	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	December 2, 2019
<b>Interim Fee Period:</b>	February 1, 2022 through and including April 30, 2022
<b>Fees Requested for this Interim Fee Period:</b>	\$1,578,687.50
<b>Expenses Requested for this Interim Fee Period:</b>	\$22,132.43
<b>Total Amount Requested for this Interim Fee Period:</b>	\$1,600,819.93
<b>Less Amount Paid to Date for this Interim Fee Period:</b>	\$426,386.76
<b>Net Amount to be Paid for this Interim Fee Period (20% holdback of fees for February and 100% for March and April):</b>	\$1,174,433.17
<b>Blended Rate in this Application for All Attorneys:</b>	\$1,279.30
<b>Blended Rate in this Application for All Timekeepers:</b>	\$1,236
<b>Number of Professionals Included in this Application:</b>	32
<b>Number of Professionals Billing Fewer than 15 Hours to the Case During this Period:</b>	19
<b>If applicable, number of professionals in this application not included in staffing plans:</b>	N/A
<b>If applicable, difference between fees budgeted and compensation sought for this period:</b>	Fees incurred were \$3,421,312.50 less than budgeted fees for this period.
<b>Any rate increases during the Eighth Interim Fee Period?</b>	No
<b>This is a(n):</b> ___ monthly <u>  X  </u> interim application      ___ final application	

**SUMMARY OF FEE STATEMENTS SUBJECT TO INTERIM PERIOD**

<i>Application</i>	<i>Total Compensation and Expenses Incurred for Period Covered</i>			<i>Total Amount Requested in Fee Statements</i>		<i>Total Unpaid</i>
<b>Date Filed/Docket No.</b>	<b>Period Covered</b>	<b>Total Fees</b>	<b>Expenses</b>	<b>Fees (80%)</b>	<b>Expenses (100%)</b>	<b>Fees and Expenses</b>
4/1/2022 [Dkt. No. 4626]	2/1/2022- 2/28/2022	\$524,028.00	\$7,164.36	\$419,222.40	\$7,164.36	\$104,805.60
5/3/2022 [Dkt. No. 4725]	3/1/2022- 3/31/2022	\$646,346.00	\$8,141.43	\$517,076.80	\$8,141.43	\$654,487.43
5/16/2022 [Dkt. No. 4823]	4/1/2022- 4/30/2022	\$408,313.50	\$6,826.64	\$326,650.80	\$6,826.64	\$415,140.14
<b>Totals:</b>		<b>\$1,578,687.50</b>	<b>\$22,132.43</b>	<b>\$126,2950.00</b>	<b>\$22,132.43</b>	<b>\$1,174,433.17</b>

**SUMMARY OF PRIOR INTERIM FEE APPLICATIONS**

<b>Date Filed/Docket No.</b>	<b>Period Covered</b>	<b>Fees Requested</b>	<b>Expenses Requested</b>	<b>Fees Paid</b>	<b>Expenses Paid</b>	<b>Order</b>
3/16/2020 [Dkt. No. 957]	9/16/2019- 1/31/2020 First Interim Period <sup>2</sup>	\$2,635,092.25	\$47,449.28	\$2,616,629.54	\$47,449.28	Dkt. Nos. 1159 & 1306
7/20/2020 [Dkt. No. 1459]	2/1/2020- 5/31/2020 Second Interim Period <sup>3</sup>	\$1,568,914.50	\$92,717.65	\$1,556,969.50	\$92,697.65	Dkt. No. 1649
11/17/2020 [Dkt. No. 1996]	6/1/2020- 9/30/2020 Third Interim Period <sup>4</sup>	\$1,698,836.50	\$69,971.34	\$1,668,836.50	\$69,971.34	Dkt. Nos. 2144 & 2353
3/17/2021 [Dkt. No. 2529]	10/1/2020- 1/31/2021 Fourth Interim Period and	\$3,818,924.65	\$60,444.15	\$3,818,924.50	\$60,444.15	Dkt. No. 2698

<sup>2</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$18,462.71 in fees and expenses.

<sup>3</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$11,965.00 in fees and expenses.

<sup>4</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$30,000.00 in fees and expenses.

	Allocation Fees <sup>5</sup>					
7/15/2021 [Dkt. No. 3234]	2/1/2020- 5/31/2021 Fifth Interim Period <sup>6</sup>	\$3,922,853.00	\$14,335.04	\$3,891,992.00	\$14,335.04	Dkt. No. 3603
11/15/2021 [Dkt. No. 4142]	2/1/2020- 5/31/2021 Sixth Interim Period <sup>7</sup>	\$5,651,625.50	\$61,624.84	\$5,626,625.50	\$61,624.84	Dkt. No. 4237
3/17/2022 [Dkt No. 4562]	10/1/2021- 1/31/2022 Seventh Interim Period <sup>8</sup>	\$3,832,741.50	\$67,611.02	\$3,805,708.50	\$67,562.01	Dkt. No. 4716

<sup>5</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$30,000 in fees. The Fourth Interim Fee Application also requested payment of \$1,585,682.00 in separate fees incurred from October 11, 2019 through and including September 30, 2020 relating to allocation of value among the Debtors' creditors ("**Allocation Fees**"). Allocation Fees were separately approved by the Court on December 22, 2020 with the entry of the *Second Supplemental Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals* [Docket No. 2190].

<sup>6</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$30,861.00 in fees.

<sup>7</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$25,000.00 in fees.

<sup>8</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$27,082.01 in fees and expenses.

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OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND FOR  
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TO: THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE:

Kramer Levin Naftalis & Frankel LLP (the “**Applicant**” or “**Kramer Levin**”), co-counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**Ad Hoc Committee**”) of the above-captioned debtors and debtors-in-possession (the “**Debtors**”) in these Chapter 11 Cases, hereby submits its Eighth Interim Application (the “**Application**”) for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred for the Period from February 1, 2022 through April 30, 2022 (the “**Eighth Interim Fee Period**”), pursuant to title 11 of the United States Code (the “**Bankruptcy Code**”) Sections 330(a) and 331, the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) Rule 2016, and the Local Bankruptcy Rules for the Southern District of New York (the “**Local Bankruptcy Rules**”) Rule 2016-1, for the interim allowance of compensation for the professional services performed by Kramer Levin for and on behalf of the Ad Hoc Committee and reimbursement of its actual and necessary expenses for the Eighth Interim Fee Period. In support of the Application, Kramer Levin respectfully represents as follows:

### **JURISDICTION**

1. The United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334.

2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

### **PRELIMINARY STATEMENT**

3. During the Eighth Interim Fee Period, Kramer Levin continued to actively represent the Ad Hoc Committee in all aspects of these Chapter 11 Cases. The Ad Hoc Committee again

played a critical role during the Eighth Interim Fee Period – which itself was a critical period of the case -- with its efforts focused primarily towards (i) filing its brief and participating in oral argument before the Second Circuit in connection with the appeals of the District Court’s order the “**District Court Order**”) vacating the Bankruptcy Court’s order confirming the chapter 11 plan (the “**Confirmation Order**”) and (ii) evaluating the *Motion of the Debtors Pursuant to U.S.C. § 105(a) and 363(b) for Entry of an Order Authorizing and Approving the Settlement Agreement* (the “**Settlement Motion**”) [Dkt. No. 4410] and making recommendations to the Ad Hoc Committee with respect to the same.

4. The substantial efforts of the Ad Hoc Committee, occurring over the course of the Eighth Interim Fee Period, required significant resources of Kramer Levin. Kramer Levin conducted extensive research of legal and factual issues and coordinated with interested parties in connection with submitting its briefing and participating in oral argument appeals before the Second Circuit and advised the Ad Hoc Committee on options and solutions to complex issues with respect to its response to the Settlement Motion.

5. In addition, Kramer Levin worked diligently to ensure that the Ad Hoc Committee and its professionals were appropriately informed of all case updates through: (i) monitoring the filings, pleadings, and other developments in the Chapter 11 Cases to ensure the Ad Hoc Committee was up-to-date on the status of the case; (ii) hosting weekly Ad Hoc Committee calls (and frequent working group calls) and disseminating extensive and detailed e-mail reports and other correspondence with the Ad Hoc Committee; and (iii) addressing the questions of Ad Hoc Committee members (and other similarly-aligned parties) inquiring about the status and disposition of the case.

6. Accordingly, Kramer Levin respectfully submits that its services during the Eighth Interim Fee Period warrant approval of its requested fees and expenses.

**SUMMARY OF PROFESSIONAL COMPENSATION  
AND REIMBURSEMENT OF EXPENSES REQUESTED**

7. This Application has been prepared in accordance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases adopted by the Court on January 23, 2013 (the “**Local Guidelines**”), as amended, and the United States Trustee for the Southern District of New York (the “**UST**”) Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996 (the “**UST Guidelines**”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 529] (the “**Interim Compensation Order**,” collectively with the Local Guidelines and UST Guidelines, the “**Guidelines**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* [Docket No. 553] (the “**Fee Assumption Order**”). Pursuant to the Local Guidelines, a certification of Kenneth H. Eckstein regarding compliance with the same is attached as **Exhibit A** hereto.

8. Kramer Levin seeks the interim allowance of fees for professional services rendered during the Eighth Interim Fee Period in the aggregate amount of \$1,578,687.50 (the “**Eighth Interim Fees**”) and reimbursement of expenses incurred in connection with the rendition of those services in the aggregate amount of \$22,132.43 (the “**Eighth Interim Expenses**”). Kramer Levin’s attorneys and paraprofessionals expended a total of approximately 1,278.00 hours for which compensation is requested.



9. There is no agreement or understanding between Kramer Levin and any other person, other than members of Kramer Levin, for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.

10. The fees charged by Kramer Levin in these Chapter 11 Cases are billed in accordance with its existing billing rates in effect during the Eighth Interim Fee Period.

11. During the course of these Chapter 11 Cases, Kramer Levin exercised its billing discretion and, as discussed in more detail below, voluntarily wrote off certain fees and expenses. Kramer Levin's decision to apply these write-offs of fees and expenses has resulted in savings to the estates during this Eighth Interim Fee Period of \$26,626.36.

12. Kramer Levin's rates for the services rendered by its professionals and paraprofessionals in these Chapter 11 Cases are the same rates that Kramer Levin charges for such professional and paraprofessional services rendered in comparable non-bankruptcy matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market.

13. Pursuant to the UST Guidelines, annexed hereto as **Exhibit B** is a schedule setting forth all professionals and paraprofessionals employed by Kramer Levin who have performed services in these Chapter 11 Cases during the Eighth Interim Fee Period, the capacities in which each such individual is employed by Kramer Levin, the department in which each individual practices, the year in which the individual was licensed to practice law in the state of New York, the hourly billing rate charged by Kramer Levin for services performed by such individual, and the aggregate number of hours expended and fees billed.

14. Annexed hereto as **Exhibit C** is a schedule specifying the categories of expenses for which Kramer Levin is seeking reimbursement and the total amount for each such expense

category. Annexed hereto as **Exhibit D** is Kramer Levin's detail of disbursements and expenses and a schedule specifying the categories of expenses for which Kramer Levin is seeking reimbursement and the total amount for each expense category for the Eighth Interim Fee Period.

15. Pursuant to the UST Guidelines, annexed hereto as **Exhibit E** is a summary of Kramer Levin's time billed during the Eighth Interim Fee Period, broken down by project categories as hereinafter described.

16. Kramer Levin maintains computerized records of the time spent by all of Kramer Levin's attorneys and paraprofessionals in connection with its representation of the Ad Hoc Committee. These records were used to prepare detailed time descriptions in accordance with the UST Guidelines and organized by project codes. These detailed time records, along with the detailed listings of the expenses incurred in connection with the services rendered, were submitted to the Court (with notice given in accordance with the Interim Compensation Order and Fee Assumption Order) as part of the Monthly Fee Statements (defined below). Copies of the final detailed time records and expenses for the Eighth Interim Fee Period are being provided herewith to the Court and the Notice Parties, and are attached hereto as **Exhibit F**.

17. Since the commencement of these Chapter 11 Cases, Kramer Levin has provided the Court with a Monthly Fee Statement for each month for which compensation was sought pursuant to the Interim Compensation Order established in these Chapter 11 Cases. During the Eighth Interim Fee Period, Kramer Levin provided the appropriate Court with the following monthly fee statements:

- a. For February 1, 2022 through and including February 28, 2022, fees of \$524,028.00 and expenses of \$7,164.36 (the "**February Fee Statement**");

b. For March 1, 2022 through and including March 31, 2022, fees of \$646,346.00 and expenses of \$8,141.43 (the “**March Fee Statement**”);

c. For April 1, 2022 through and including April 30, 2022, fees of \$408,313.50 and expenses of \$6,826.64 (the “**April Fee Statement**,” collectively with the February Fee Statement, and the March Fee Statement, the “**Monthly Fee Statements**”).

18. In total, Kramer Levin has submitted Monthly Fee Statements during the Eighth Interim Fee Period for fees of \$1,578,687.50 and expenses of \$22,132.43. As of the date of this Application, no notice party has objected to the Monthly Fee Statements.

19. Prior to the service of each Monthly Fee Statement, Kramer Levin conducted an internal review of fees and expenses incurred during that month. As a result of such review, Kramer Levin wrote off a total of \$25,636.50 in fees and \$989.86 in expenses. The Monthly Fee Statements reflected the reduced amount after write-offs. Accordingly, Kramer Levin hereby seeks allowance of fees incurred for the Eighth Interim Fee Period in the amount of \$1,578,687.50, and the reimbursement of actual and necessary expenses incurred for the Eighth Interim Fee Period in the amount of \$22,132.43.

20. In accordance with the Interim Compensation Order, Kramer Levin sought payment of 80% of its fees and 100% of its expenses incurred, pursuant to each Fee Statement filed with the Court.

21. In total, therefore, pursuant to this Application, Kramer Levin respectfully requests that the Court enter an order awarding Kramer Levin, on an interim basis, fees in an aggregate amount of \$1,578,687.50 and the reimbursement of actual and necessary expenses Kramer Levin

incurred during the Eighth Interim Fee Period in the aggregate amount of \$22,132.43. Kramer Levin requests payment of 20% of its fees that have been held back for the Fee Statements.

22. To the extent that time or disbursement charges for services rendered or expenses incurred relate to the Eighth Interim Fee Period, but were not processed prior to the preparation of this Application, Kramer Levin reserves the right to request compensation for such services and reimbursement of such expenses in a future application.

23. A budget and staffing plan for the Eighth Interim Fee Period is attached hereto as **Exhibit G**, which includes a comparison to actual amounts.<sup>2</sup>

24. Kramer Levin's rates in these Chapter 11 Cases are consistent with the rates charged by Kramer Levin to its non-bankruptcy clients. These rates are similar to the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy and bankruptcy cases in a competitive national legal market. Pursuant to the U.S. Trustee Guidelines, **Exhibit H** discloses the blended hourly rates for all non-bankruptcy timekeepers in the New York office of Kramer Levin and the blended hourly rates for timekeepers who billed to the Committee during the Eighth Interim Fee Period.

25. Prior to filing this Application, Kramer Levin provided the Ad Hoc Committee with a copy of the Application.

### **BACKGROUND**

26. On September 15, 2019, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to Bankruptcy Code Sections 1107 and 1108.

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<sup>2</sup> A non-itemized monthly budget was provided to the Debtors for the period covered by this Application. An itemized budget is included with this Application for convenience. The fees sought in this Application are not, in the aggregate, more than 10% higher as compared to the non-itemized budget.

27. The Ad Hoc Committee consists of (i) ten States, (ii) the PEC, (iii) six political subdivisions of States, and (iv) one federally recognized American Indian tribe, as identified in the verified statement filed pursuant to Bankruptcy Rule 2019 at Docket Number 279.

28. The Ad Hoc Committee is represented in these bankruptcy cases by the following counsel: (i) Kramer Levin Naftalis & Frankel LLP, as lead bankruptcy counsel; (ii) Brown Rudnick LLP, as coordinating counsel for the non-state members of the Ad Hoc Committee, including the PEC; (iii) Otterbourg P.C., as coordinating counsel for the state members of the Ad Hoc Committee; and (iv) Gilbert LLP, as mass tort, deal and insurance counsel. In addition, the Ad Hoc Committee has retained financial professionals to assist in, among other things, conducting diligence relating to the Settlement Term Sheet, and evaluating and structuring the complex sale and M&A transactions for the Sackler assets.

29. On October 29, 2019, the Debtors filed the *Motion to Assume the Prepetition Reimbursement Agreement with the Ad Hoc Committee, and to Pay the Fees and Expenses of the Ad Hoc Committee's Professionals* [Docket No. 394] (the “**Fee Assumption Motion**”).

30. On December 2, 2019, the Court granted the Fee Assumption Motion by entering the Fee Assumption Order.

#### **SUMMARY OF LEGAL SERVICES RENDERED**

31. During the Eighth Interim Fee Period, the Ad Hoc Committee has completed substantial work with the key case constituencies, including of particular note, participating in an appeal of the confirmation order before the District Court and appealing the District Court Order to the Second Circuit. The following summary is not a detailed description of the work performed, as the day-to-day services and the time expended in performing such services are fully set forth in **Exhibit F**. Rather, the following summary highlights certain areas in which services were

rendered to the Ad Hoc Committee and identifies some of the issues to which Kramer Levin devoted significant time and effort during the Eighth Interim Fee Period.

32. The summary is divided according to the project billing codes, which were created by Kramer Levin (in coordination with the other professionals for the Ad Hoc Committee) to best reflect the categories of tasks that it was required to perform in connection with these Chapter 11 Cases. Nevertheless, given the interconnectedness of the issues in these Chapter 11 Cases, certain of these categories may overlap with others.<sup>3</sup>

**A. Business Operations**  
**Billing Code: 00003**  
**(Fees: \$59,575.50 / Hours Billed: 45.20)**

33. During the Eighth Interim Fee Period, Kramer Levin committed discrete tasks in connection with evaluating the Debtors' motion to approve entry into an amended and restated funding agreement between PPLP and Harm Reduction Therapeutics, Inc. ("HRT") and attended the hearing related to same. Kramer Levin also worked with its financial advisors in evaluating the Debtors' proposed 2022 KEIP and KERP plans.

**C. Case Administration**  
**Billing Code: 00004**  
**(Fees: \$2,493.00 / Hours Billed: 5.10)**

34. During the Eighth Interim Fee Period, Kramer Levin was required to perform discrete administrative tasks necessary to assist the Ad Hoc Committee and its professionals in functioning efficiently, including, but not limited to: maintaining work-in-progress reports and work streams; internal organizational meetings and organizational meetings among professionals; monitoring calendars of critical dates; preparing materials for internal distribution; coordinating

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<sup>3</sup> The fees and hours for each matter listed below reflect the voluntary write-offs and reductions of the Monthly Fee Statements discussed above.

conferences and meetings with Ad Hoc Committee professionals; obtaining filed pleadings and maintaining case folders of the same; and routine communications and correspondences.

**D. Employment and Fee Applications**

**Billing Code: 00006**

**(Fees: \$50,294.00 / Hours Billed: 59.60)**

35. In the course of the Eighth Interim Fee Period, Kramer Levin prepared, filed and served several monthly fee statements, and reviewed and coordinated the monthly fee statements of other Ad Hoc Committee professionals filed in these Chapter 11 Cases.

36. This matter also includes time spent reviewing Kramer Levin's and other Ad Hoc Committee professionals' monthly invoices for compliance with UST Guidelines and for privilege and confidentiality concerns, and coordinating filing of such invoices with the Bankruptcy Court.

**E. Litigation**

**Billing Code: 00008**

**(Fees: \$896,635.50 / Hours Billed: 762.90)**

37. During the Eighth Interim Fee Period, Kramer Levin conducted extensive research and dedicated considerable time in connection with the appeals of the District Court Order. Kramer Levin drafted and filed both its appellant opening brief and reply brief in the Second Court, which required significant legal and factual research and coordination among the other appellants.

38. Kramer Levin also closely evaluated, and prepared responses with arguments raised in connection with, the appellee briefs that were filed during the Eighth Interim Fee Period. Kramer Levin prepared detailed updates regarding all of the briefs filed during the Eighth Interim Fee Period to report to the Ad Hoc Committee members.

39. After filing its brief, Kramer Levin prepared for and participated in oral argument before the Second Circuit. Kramer Levin spent significant time preparing for oral argument, which included participating in moot court along with the other appellants.

40. Kramer Levin also analyzed the Settlement Motion during the Eighth Interim Period and prepared recommendations to the Ad Hoc Committee. Kramer Levin engaged in numerous discussions with Ad Hoc Committee members and professionals as well as other parties-in-interest in evaluating the merits of the underlying settlement. Kramer Levin ultimately filed the *Limited Objection to Debtors' Motion to Approve Settlement Term Sheet* [Dkt. No. 4471], which required additional legal and factual research. Kramer Levin also dedicated time to preparing for, and participating in, the hearing to approve the Settlement Motion.

41. Additionally, during the last month of the Eighth Interim Fee Period, Kramer Levin also reviewed the Debtors' motions seeking extensions of the preliminary injunction and prepared recommendations to the Ad Hoc Committee.

**F. Meetings and Communications with Ad Hoc Committee & Creditors**

**Billing Code: 00009**

**(Fees: \$216,679.00 / Hours Billed: 162.50)**

42. Due to the level of activity during the Eighth Interim Fee Period, the Ad Hoc Committee often held group calls or meetings once a week (if not more often when the exigencies of the case required). The general purpose of these meetings was to keep the Ad Hoc Committee informed of developments and current issues in these Chapter 11 Cases, and to discuss, analyze, and vote on Ad Hoc Committee positions with respect to matters requiring their input. Ad Hoc Committee meetings required preparation by Kramer Levin professionals and other Ad Hoc Committee professionals and often included multiple agenda items.

43. Kramer Levin coordinated with the Ad Hoc Committee's other professionals on these meetings, on tasks including drafting and setting agendas and preparing and reviewing materials.

44. Ad Hoc Committee meetings also often required internal pre-meeting and post-meeting conferences among the professionals to prepare for Ad Hoc Committee calls and/or to



discuss follow-up items that arose on such calls. Frequently, due to the number and complexity of items on the agenda for a given meeting, the participation of multiple professionals (including from multiple legal fields) was necessary to ensure that Kramer Levin could be responsive to members' questions as they arose.

45. In addition, Kramer Levin provided the Ad Hoc Committee with frequent detailed e-mail updates of recently filed pleadings, case issues and negotiations, and other items relevant to the Chapter 11 Cases.

**G. Plan and Disclosure Statement**  
**Billing Code: 00011**  
**(Fees: \$349,930.50 / Hours Billed: 240.70)**

46. During the Eighth Interim Fee Period, Kramer Levin and the Ad Hoc Committee worked tirelessly with the Debtors and other parties in interest to evaluate the settlement embodied in the Settlement Motion, included the supplemental opioid abatement fund (the "**SOAF**") and its impact on the Debtors' chapter 11 plan structures. Kramer Levin also frequently communicated with Judge Chapman, the Debtors, and other parties in interest to stay apprised of the ongoing mediation before Judge Chapman. Kramer Levin also had frequent communications with Ad Hoc Committee members regarding the mediation status and its impact on the Debtors' potential emergence from bankruptcy.

47. Additionally, Kramer Levin's tax team continued to analyze tax structures in connection with the chapter 11 plan. Kramer Levin participated in several meetings and calls with other Ad Hoc Committee professionals and other parties in interest with respect to the tax matters agreement governing the post-emergence trusts and other entities.

**STATEMENT OF KRAMER LEVIN**

48. The foregoing professional services performed by Kramer Levin were appropriate and necessary. The professional services were in the best interests of the Ad Hoc Committee, the

Debtors' estates and other parties-in-interest. Compensation for the foregoing professional services as requested is commensurate with the complexity, importance and nature of the problems, issues or tasks involved. The professional services were performed in an appropriately expeditious and efficient manner.

49. The majority of the services performed by Kramer Levin were rendered by Kramer Levin's Corporate Restructuring and Bankruptcy Group. Kramer Levin has a prominent practice in this area and enjoys a national reputation for its expertise in financial reorganizations and restructurings. The attorneys at Kramer Levin have substantial experience representing creditor groups in many chapter 11 cases. In addition, due to the facts and circumstances of these Chapter 11 Cases, attorneys from Kramer Levin's corporate practice group, as well as attorneys in other specialized areas as necessary, were involved with Kramer Levin's representation of the Ad Hoc Committee. Overall, Kramer Levin brings a particularly high level of skill and knowledge which has inured to the benefit of the Ad Hoc Committee in this case.

50. The professional services performed by Kramer Levin on behalf of the Committee during the Eighth Interim Fee Period required an aggregate expenditure of approximately 1,280.00 recorded hours by Kramer Levin's members, counsel, associates and paraprofessionals. Of the aggregate time expended, 812.10 recorded hours were expended by partners and counsel of Kramer Levin, 398.30 recorded hours were expended by associates, and 69.60 recorded hours were expended by paraprofessionals of Kramer Levin.

51. During the Eighth Interim Fee Period, Kramer Levin's hourly billing rates for attorneys ranged from \$715 to \$1,685 per hour. Allowance of compensation in the amount requested would result in a blended hourly billing rate for attorneys of approximately \$1,279.30 per hour (based upon 1,210.40 recorded hours for professionals at Kramer Levin's regular billing

rates in effect at the time of the performance of professional services), and a total blended hourly billing rate for Kramer Levin's paraprofessionals of \$478.53 per hour (based upon 69.60 recorded hours for paraprofessionals at Kramer Levin's regular billing rates in effect at the time of the performance of the services).

52. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable bankruptcy cases in a competitive national legal market. As noted, attached hereto in **Exhibit B** is a schedule listing each Kramer Levin professional and paraprofessional who performed services in these Chapter 11 Cases during the Eighth Interim Fee Period, the hourly rate charged by Kramer Levin for services performed by each individual, and the aggregate number of hours and charges by each individual. Kramer Levin provided a copy of the Application to the Ad Hoc Committee prior to filing the Application and received no objection to its filing.

**ACTUAL AND NECESSARY EXPENSES OF KRAMER LEVIN**

53. As set forth in **Exhibit C** hereto, Kramer Levin has disbursed \$22,132.43 as expenses incurred in providing professional services during the Eighth Interim Fee Period. Pursuant to Kramer Levin's policies (which we believe are comparable to those of other New York City law firms), Kramer Levin has (and will continue) to pay certain expenses of professionals who work past 8:00 p.m. and on weekends and holidays in the service of its clients, and/or for business travel, including to and from Court hearings or remote meetings. These expenses include meal charges and car fares. Consistent with the U.S. Trustee Guidelines, Kramer Levin has also voluntarily reduced its request for reimbursement for late-working professionals' meal charges to \$20 per meal to the extent that such meal charges were in excess of this limit.

54. With respect to photocopying expenses, Kramer Levin charged \$0.10 per page. Kramer Levin does not charge for facsimile transmissions, other than the cost of long distance facsimiles at applicable toll charge rates, which invariably are less than \$1.25 per page, as permitted by the Guidelines. Each of these categories of expenses falls below the maximum rates set by the Guidelines. These charges are intended to cover Kramer Levin's direct operating costs, which costs are not incorporated into Kramer Levin's hourly billing rates. Only clients who actually use services of the types set forth in **Exhibit C** are separately charged for such services.

55. In addition, due to the locations of Ad Hoc Committee members, long-distance telephone calls were often required. These disbursements are not included in Kramer Levin's overhead for the purpose of setting billing rates.

56. Kramer Levin has made every effort to minimize its disbursements in these cases. The actual expenses incurred in providing professional services were absolutely necessary, reasonable, economical, and justified under the circumstances to enable Kramer Levin to serve the needs of the Ad Hoc Committee.

57. The members of the Ad Hoc Committee also incurred certain expenses in the performance of their duties as members of the Ad Hoc Committee. This Application seeks allowance of these necessary disbursements by the Ad Hoc Committee members, in accordance with the terms of the Fee Assumption Order.

**THE REQUESTED COMPENSATION SHOULD BE ALLOWED**

58. The Fee Assumption Order provides that Kramer Levin's reasonable and documented fees and expenses shall be subject, *mutatis mutandis*, to the procedures with respect to the authorization of payment of the fees and expenses of the professionals of the Debtors and the UCC as set forth in the Interim Compensation Order. Therefore, while this Application is not

strictly subject to sections 331 and 330 of the Bankruptcy Code, we are guided by such provisions in making this Application. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of 11 U.S.C. § 330 to govern the Bankruptcy Court's award of such compensation.

59. Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded . . . , the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

(A) the time spent on such services;

(B) the rates charged for such services;

(C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

(D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

(E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

60. Here, Kramer Levin respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, believed to be necessary for, beneficial to, and in the best interests of, the Ad Hoc Committee. Kramer Levin further submits that the compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Ad Hoc Committee. The services rendered by Kramer Levin were consistently

performed in a timely and efficient manner commensurate with the complexity, importance, and nature of the issues involved. Kramer Levin respectfully submits that approval of the compensation sought herein is warranted.

**STATEMENT PURSUANT TO APPENDIX B OF THE GUIDELINES**

61. The following is provided in response to the request for additional information set forth in the Guidelines.

- a) Kramer Levin seeks reimbursement of fees and expenses that are permissible under the relevant rules, court orders, and Bankruptcy Code provisions. In addition, Kramer Levin provided voluntary write-offs of both fees and expenses during the Eighth Interim Fee Period in its discretion.
- b) The fees and expenses sought in the Application are billed at rates customarily employed by Kramer Levin, and generally accepted by Kramer Levin's clients. None of the professionals seeking compensation in the Application varied their hourly rate based on the geographic location of the Debtors' cases.
- c) For the Eighth Interim Fee Period, Kramer Levin is not seeking fees that exceed, in the aggregate, non-itemized budgeted amounts for that period by more than 10%.
- d) This Application includes certain time (and fees) related to preparing, reviewing, or revising fee statements to comply with the local bankruptcy rules and U.S. Trustee guidelines. These fees are reflected in a portion of the amount requested in billing code number 6, Employment and Fee Applications (which matter also includes time spent by Kramer Levin reviewing other professionals' employment and fee applications and reviewing time records to redact or address privileged or other confidential information). Such time was necessary in order to comply with applicable guidelines and the Interim Compensation Order and to file monthly fee applications (which is a distinct requirement in bankruptcy matters).
- e) In connection with the preparation of its monthly invoices, Kramer Levin reviewed its monthly invoices at the time that they were filed for privilege and confidentiality. The Application includes fees incurred in conducting that review.
- f) This Application includes three rate increases since Kramer Levin's retention. On March 16, 2020, March 17, 2021, and March 17 2022, respectively, Kramer Levin filed its Fourth, Sixteenth, and Twenty-Eighth Monthly Fee Statements where it disclosed that it had increased hourly rates charged by professionals as

of January 1, 2020, January 1, 2021, and January 1, 2022, respectively, in accordance with its annual review process.

### **NOTICE**

Notice of this Application has been provided in accordance with the Guidelines and the Interim Compensation Order. Because of the nature of the relief requested, the Ad Hoc Committee submits that such notice is sufficient and that no further notice of the relief requested in the Application need be given to any party.

### **CONCLUSION**

WHEREFORE, Kramer Levin respectfully requests that the Bankruptcy Court enter an order: (i) authorizing the Debtors to pay the entirety of the unpaid balance of all approved fees for the Eighth Interim Period (including holdback amounts) and (ii) granting such other relief as is just and proper.

Dated: New York, New York  
May 16, 2022

Respectfully submitted,

By: /s/ Kenneth H. Eckstein

Kenneth H. Eckstein  
Rachael Ringer  
Caroline F. Gange  
**KRAMER LEVIN NAFTALIS &  
FRANKEL LLP**  
1177 Avenue of the Americas  
New York, New York 10036  
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*Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent Litigation  
Claimants*

**Exhibit A**

Certification of Kenneth H. Eckstein



**KRAMER LEVIN NAFTALIS & FRANKEL LLP**

Kenneth H. Eckstein

Rachael Ringer

Caroline F. Gange

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New York, New York 10036

Telephone: (212) 715-9100

Facsimile: (212) 715-8000

*Attorneys for the Ad Hoc Committee of  
Governmental and Other Contingent Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
<b>In re:</b>	: <b>Chapter 11</b>
	:
<b>PURDUE PHARMA L.P., et al.,</b>	: <b>Case No. 19-23649 (RDD)</b>
	:
<b>Debtors.<sup>1</sup></b>	:
	:
-----X	

**CERTIFICATION UNDER GUIDELINES FOR FEES AND DISBURSEMENTS  
FOR PROFESSIONALS IN RESPECT OF EIGHTH INTERIM APPLICATION OF  
KRAMER LEVIN NAFTALIS & FRANKEL LLP, AS CO-COUNSEL TO THE  
AD HOC COMMITTEE, FOR ALLOWANCE OF COMPENSATION FOR  
PROFESSIONAL SERVICES RENDERED AND FOR REIMBURSEMENT  
OF ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE  
PERIOD FROM FEBRUARY 1, 2022 THROUGH APRIL 30, 2022**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

I, Kenneth H. Eckstein, hereby certify that:

1. I am a member of Kramer Levin Naftalis & Frankel LLP (the “**Applicant**” or “**Kramer Levin**”) and co-counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**Ad Hoc Committee**”) of the above-captioned debtors and debtors-in-possession (the “**Debtors**”) in these chapter 11 cases (the “**Chapter 11 Cases**”). Kramer Levin submits this eighth application for interim compensation and reimbursement of expenses in compliance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York adopted by the Bankruptcy Court on January 23, 2013 (the “**Local Guidelines**”), as amended, and the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996 (the “**UST Guidelines**”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 529] (the “**Interim Compensation Order**,” collectively with the Local Guidelines and UST Guidelines, the “**Guidelines**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* [Docket No. 553] (the “**Fee Assumption Order**”).

2. This certification is made in respect of Kramer Levin’s application, dated May 16, 2022 (the “**Application**”), for interim compensation and reimbursement of expenses for the period commencing February 1, 2022 through and including April 30, 2022 (the “**Eighth Interim Fee Period**”) in accordance with the Guidelines.

3. In respect of Section B.1 of the Local Guidelines, I certify that:

- a. I have read the Application;
- b. to the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Local Guidelines and the UST Guidelines;

- c. the fees and disbursements sought are billed at rates in accordance with the practices customarily employed by Kramer Levin and generally accepted by Kramer Levin's clients; and
- d. in providing a reimbursable service, Kramer Levin does not make a profit on that service, whether the service is performed by Kramer Levin in-house or through a third party.

4. I certify that the Creditors' Committee, Debtors, and U.S. Trustee will each be provided with a copy of the Application concurrently with the filing thereof and will have at least 14 days to review such Application prior to any objection deadline with respect thereto.

Dated: New York, New York  
May 16, 2022

/s/ Kenneth H. Eckstein  
Kenneth H. Eckstein

**Exhibit B**

**Summary of Professionals – Eighth Interim Fee Period  
February 1, 2022 – April 30, 2022**

<b>Timekeeper</b>	<b>Title</b>	<b>Department</b>	<b>Year Admitted to Bar</b>	<b>Billed Hours</b>	<b>Rate<sup>1</sup></b>	<b>Amount (\$)</b>
John Bessonette	Partner	Corporate	1999	1.70	1,300	\$2,422.50
David E. Blabey	Partner	Creditor's Rights	2005	250.40	1,215	\$304,235.50
Jonathan S. Caplan	Partner	Intellectual Property	1993	6.00	1,300	\$8,550.00
Kenneth H. Eckstein	Partner	Creditor's Rights	1980	220.00	1,685	\$370,700.00
Roy T. Englert, Jr.	Partner	Litigation	1981	76.10	1,540	\$117,194.00
David J. Fisher	Partner	Corporate	1985	70.30	1,580	\$111,074.00
Todd E. Lenson	Partner	Corporate	1997	1.30	1,525	\$2,145.00
Abraham Reshtick	Partner	Tax	2003	8.50	1,400	\$11,900.00
Rachael Ringer	Partner	Creditor's Rights	2011	32.90	1,315	\$43,263.50
Adam Rogoff	Partner	Creditor's Rights	1989	6.00	1,555	\$9,330.00
Jordan M. Rosenbaum	Partner	Corporate	2004	30.60	1,400	\$42,840.00
Jonathan M. Wagner	Partner	Litigation	1984	19.80	1,500	\$29,700.00
Helayne O. Stoopack	Counsel	Tax	1982	18.00	1,240	\$22,320.00
Marcus Colucci	Special Counsel	Intellectual Property	2003	11.30	1,105	\$13,729.50
Joseph Shifer	Special Counsel	Special Counsel	2010	48.00	1,195	\$57,360.00
Jeffrey Taub	Special Counsel	Corporate	2010	11.20	1,195	\$13,384.00
Lauren Cassady Andrews	Associate	Litigation	2017	1.90	1,040	\$1,976.00

<sup>1</sup> Kramer Levin increased rates as of January 1, 2022 in connection with its annual review process.

<b>Timekeeper</b>	<b>Title</b>	<b>Department</b>	<b>Year Admitted to Bar</b>	<b>Billed Hours</b>	<b>Rate<sup>1</sup></b>	<b>Amount (\$)</b>
Elan Daniels	Associate	Creditor's Rights	2009	1.20	1,195	\$1,434.00
Zachary Ferguson	Associate	Litigation	2019	1.90	965	\$1,833.50
Caroline Gange	Associate	Creditor's Rights	2017	179.60	1,110	\$199,356.00
Declan Kelly	Associate	Creditor's Rights	2021	162.20	785	\$127,327.00
Mariya Khvatskaya	Associate	Tax	2016	14.20	1,140	\$16,188.00
Matthew Klegon	Associate	Corporate	2016	3.90	1,140	\$4,446.00
Daniel Lennard	Associate	Litigation	2014	18.90	1,185	\$22,396.50
Sealteil, Ortega- Rodriguez	Associate	Intellectual Property	Not yet admitted	7.60	715	\$5,966.00
Lisa Pistilli	Associate	Corporate	2002	3.90	1,140	\$4,446.00
Seth Schinfeld	Associate	Litigation	2007	0.90	1,090	\$1,075.50
Carlos Tirado	Associate	Intellectual Property	2020	2.10	890	\$1,869.00
Wendy Kane	Paralegal	Creditor's Rights	N/A	67.80	480	\$32,544.00
Jacqueline Kindler	Paralegal	Creditor's Rights	N/A	0.40	480	\$192.00
Jill Ranson	Other Time- keeper	Litigation Technology	N/A	1.10	450	\$495.00
Alexander Thornton	Other Time- keeper	Managing Attorney's Office	N/A	0.30	250.00	\$75.00
<b>Subtotal</b>				1,280.00		\$1,581,767.50
<b>Less 50% Non-Working Travel</b>						(\$3,080.00)
<b><u>TOTAL</u></b>				1,280.00		\$1,578,687.50

**Exhibit C**

Summary of Expenses/Disbursements

<b><u>DESCRIPTION</u></b>	<b><u>AMOUNT (\$)</u></b>
Color Copies	\$2.70
Courier Services	118.19
Data Hosting Charges	6,302.07
Lexis Online Research	4,646.14
Pacer Online Research	240.40
Photocopying	331.20
Postage	10.88
Printing & Binding	4,236.06
Telecommunication Charges	103.21
Transcript Fees and Deposition Charges	739.20
Westlaw Online Research	5,402.38
<b><u>TOTAL</u></b>	<b>\$22,132.43</b>

**Exhibit D**

Detail of Disbursements Made During Eighth Interim Fee Period

**Kramer Levin**



March 31, 2022

Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

Invoice #: 848873  
072952  
Page 1

**FOR PROFESSIONAL SERVICES rendered through February 28, 2022.**

Disbursements and Other Charges	7,164.36
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FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas, New York, NY 10036  
T 212.715.9100 F 212.715.8000





March 31, 2022  
Invoice #: 848873  
072952

**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Courier Services	\$32.88
Data Hosting Charges	2,100.69
Lexis Online Research	2,033.33
Pacer Online Research	132.00
Photocopying	156.00
Postage	8.16
Transcript Fees	102.00
Westlaw Online Research	2,599.30
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$7,164.36</b>

**DISBURSEMENTS AND OTHER CHARGES DETAIL**

**Courier Services**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/14/2022	Kane Wendy	Fedex charges by Kane, Wendy on 02/14/2022 (#289808540055)	\$32.88
<b>Subtotal</b>			<b>\$32.88</b>

**Data Hosting Charges**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/28/2022	Eckstein Kenneth H.	Data Hosting Charges	\$2,100.69



March 31, 2022  
Invoice #: 848873  
072952  
Page 2

<b>Subtotal</b>	<b>\$2,100.69</b>
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**Lexis Online Research**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/2/2022	Gange Caroline	Lexis Online Research	\$580.97
2/3/2022	Schubeck Barbara	Lexis Online Research	\$1,167.90
2/28/2022	Gange Caroline	Lexis Online Research	\$142.23
2/28/2022	Kelly Declan	Lexis Online Research	142.23
<b>Subtotal</b>			<b>\$2,033.33</b>

**Pacer Online Research**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/2/2022	Ford Samantha	Pacer Online Research Ford, Samantha	\$2.00
2/7/2022	Lennard Daniel	Pacer Online Research Lennard, Daniel	\$34.40
2/8/2022	Kane Wendy	Pacer Online Research Kane, Wendy	\$5.70
2/10/2022	Kane Wendy	Pacer Online Research Kane, Wendy	\$2.60
2/11/2022	Kane Wendy	Pacer Online Research Kane, Wendy	\$10.70
2/13/2022	Gange Caroline	Pacer Online Research Gange, Caroline	\$12.50
2/14/2022	Kane Wendy	Pacer Online Research Kane, Wendy	\$20.70
2/22/2022	Kane Wendy	Pacer Online Research Kane, Wendy	\$43.40



March 31, 2022  
Invoice #: 848873  
072952  
Page 3

<b>Subtotal</b>	<b>\$132.00</b>
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**Photocopying**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/1/2022	Kane Wendy	Photocopying Kane, Wendy	\$89.80
2/10/2022	Kane Wendy	Photocopying Kane, Wendy	\$2.40
2/14/2022	Kane Wendy	Photocopying Kane, Wendy	\$53.70
2/22/2022	Kane Wendy	Photocopying Kane, Wendy	\$10.10
<b>Subtotal</b>			<b>\$156.00</b>

**Postage**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/10/2022	Kane Wendy	Postage charge by Kane, Wendy	\$8.16
<b>Subtotal</b>			<b>\$8.16</b>

**Transcript Fees**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/1/2022	Kane Wendy	Veritext New York Reporting Co., A Veritext Company	\$46.80
2/17/2022	Kane Wendy	Veritext New York Reporting Co., A Veritext Company	\$55.20
<b>Subtotal</b>			<b>\$102.00</b>



March 31, 2022  
Invoice #: 848873  
072952  
Page 4

**Westlaw Online Research**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/1/2022	Lennard Daniel	Westlaw Online Research	\$240.54
2/1/2022	Kelly Declan	Westlaw Online Research	308.60
2/2/2022	Lennard Daniel	Westlaw Online Research	\$204.18
2/2/2022	Gange Caroline	Westlaw Online Research	240.54
2/2/2022	Kelly Declan	Westlaw Online Research	80.18
2/4/2022	Gange Caroline	Westlaw Online Research	\$240.54
2/7/2022	Gange Caroline	Westlaw Online Research	\$120.73
2/9/2022	Blabey David E.	Westlaw Online Research	\$80.18
2/9/2022	Kelly Declan	Westlaw Online Research	442.38
2/16/2022	Blabey David E.	Westlaw Online Research	\$481.07
2/28/2022	Shifer Joseph A.	Westlaw Online Research	\$80.18
2/28/2022	Kelly Declan	Westlaw Online Research	80.18
<b>Subtotal</b>			<b>\$2,599.30</b>
<b>TOTAL</b>			<b>\$7,164.36</b>

**Kramer Levin**



April 30, 2022

Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

Invoice #: 850891  
072952  
Page 1

**FOR PROFESSIONAL SERVICES rendered through March 31, 2022.**

Disbursements and Other Charges

8,141.43

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas, New York, NY 10036  
T 212.715.9100 F 212.715.8000



April 30, 2022  
Invoice #: 850891  
072952

**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Color Copies	\$2.70
Courier Services	60.12
Data Hosting Charges	2,100.69
Lexis Online Research	2,612.81
Pacer Online Research	108.40
Photocopying	28.30
Postage	2.72
Telecommunication Charges	14.27
Transcript Fees	516.00
Westlaw Online Research	2,695.42
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$8,141.43</b>

**DISBURSEMENTS AND OTHER CHARGES DETAIL**

**Color Copies**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/4/2022	Fisher David J.	Color Copies Fisher, David J.	\$2.70
<b>Subtotal</b>			<b>\$2.70</b>



April 30, 2022  
Invoice #: 850891  
072952  
Page 2

#### Courier Services

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/4/2022	Fisher David J.	Fedex charges by Michael Santiago on 03/04/2022 (#270506737982)	\$45.68
3/8/2022	Kane Wendy	Fedex charges by Kane, Wendy on 03/08/2022 (#270633868373)	\$14.44
<b>Subtotal</b>			<b>\$60.12</b>

#### Data Hosting Charges

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/29/2022	Eckstein Kenneth H.	Data Hosting Charges	\$2,100.69
<b>Subtotal</b>			<b>\$2,100.69</b>

#### Lexis Online Research

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/11/2022	Kelly Declan	Lexis Online Research	\$1,400.42
3/17/2022	Kelly Declan	Lexis Online Research	\$844.12
3/18/2022	Blabey David E.	Lexis Online Research	\$368.27
<b>Subtotal</b>			<b>\$2,612.81</b>

#### Pacer Online Research

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/2/2022	Kane Wendy	Pacer Online Research Kane, Wendy	\$11.30



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3/22/2022	Kane Wendy	Pacer Online Research Kane, Wendy	\$6.20
3/22/2022	Gange Caroline	Pacer Online Research Gange, Caroline	12.20
3/23/2022	Gange Caroline	Pacer Online Research Gange, Caroline	\$3.20
3/25/2022	Ford Samantha	Pacer Online Research Ford, Samantha	\$3.50
3/25/2022	Kane Wendy	Pacer Online Research Kane, Wendy	19.30
3/25/2022	Gange Caroline	Pacer Online Research Gange, Caroline	15.10
3/28/2022	Gange Caroline	Pacer Online Research Gange, Caroline	\$26.80
3/29/2022	Kane Wendy	Pacer Online Research Kane, Wendy	\$10.80
<b>Subtotal</b>			<b>\$108.40</b>

**Photocopying**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/4/2022	Fisher David J.	Photocopying Fisher, David J.	\$25.60
3/8/2022	Kane Wendy	Photocopying Kane, Wendy	\$1.50
3/26/2022	Kane Wendy	Photocopying Kane, Wendy	\$1.20
<b>Subtotal</b>			<b>\$28.30</b>





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**Postage**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/28/2022	Kane Wendy	Postage charge by Kane, Wendy	\$2.72
<b>Subtotal</b>			<b>\$2.72</b>

**Telecommunication Charges**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/8/2022	Kane Wendy	Telecommunication Charges by Wendy Kane	\$2.39
2/8/2022	Kelly Declan	Telecommunication Charges by Declan Kelly	2.01
2/10/2022	Eckstein Kenneth H.	Telecommunication Charges by Daniel Lennard	\$2.08
2/10/2022	Kelly Declan	Telecommunication Charges by Declan Kelly	0.04
2/14/2022	Kelly Declan	Telecommunication Charges by Declan Kelly	\$0.04
2/16/2022	Gange Caroline	Telecommunication Charges by Caroline Gange	\$2.00
2/28/2022	Gange Caroline	Telecommunication Charges by Caroline Gange	\$3.28
2/28/2022	Kelly Declan	Telecommunication Charges by Declan Kelly	2.43
<b>Subtotal</b>			<b>\$14.27</b>



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#### Transcript Fees

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/9/2022	Kane Wendy	Veritext New York Reporting Co., A Veritext Company	\$260.40
3/10/2022	Kane Wendy	Veritext New York Reporting Co., A Veritext Company	\$207.60
3/23/2022	Kane Wendy	Veritext New York Reporting Co., A Veritext Company	\$48.00
<b>Subtotal</b>			<b>\$516.00</b>

#### Westlaw Online Research

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/1/2022	Kelly Declan	Westlaw Online Research	\$1,039.06
3/2/2022	Blabey David E.	Westlaw Online Research	\$221.16
3/3/2022	Blabey David E.	Westlaw Online Research	\$88.26
3/11/2022	Blabey David E.	Westlaw Online Research	\$353.02
3/14/2022	Blabey David E.	Westlaw Online Research	\$529.54
3/17/2022	Kelly Declan	Westlaw Online Research	\$264.77
3/23/2022	Kelly Declan	Westlaw Online Research	\$199.61
<b>Subtotal</b>			<b>\$2,695.42</b>
<b>TOTAL</b>			<b>\$8,141.43</b>

**Kramer Levin**



May 16, 2022

Ad Hoc Committee of Governmental and Other  
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**FOR PROFESSIONAL SERVICES rendered through April 30, 2022.**

Disbursements and Other Charges

6,826.64

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas, New York, NY 10036  
T 212.715.9100 F 212.715.8000



May 16, 2022  
Invoice #: 852302  
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**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Courier Services	\$25.19
Data Hosting Charges	2,100.69
Photocopying	146.90
Printing & Binding	4,236.06
Telecommunication Charges	88.94
Transcript Fees	121.20
Westlaw Online Research	107.66
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$6,826.64</b>

**DISBURSEMENTS AND OTHER CHARGES DETAIL**

**Courier Services**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
4/20/2022	Barry Elaine	Fedex charges by Barry, Elaine on 04/20/2022 (#272240611898)	\$25.19
<b>Subtotal</b>			<b>\$25.19</b>



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#### Data Hosting Charges

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
4/27/2022	Eckstein Kenneth H.	Data Hosting Charges	\$2,100.69
<b>Subtotal</b>			<b>\$2,100.69</b>

#### Photocopying

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
4/11/2022	Caplan Jonathan S.	Photocopying Caplan, Jonathan S.	\$146.90
<b>Subtotal</b>			<b>\$146.90</b>

#### Printing & Binding

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/31/2022	Kane Wendy	Counsel Press LLC	\$4,236.06
<b>Subtotal</b>			<b>\$4,236.06</b>

#### Telecommunication Charges

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/28/2022	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$13.51
3/3/2022	Taub Jeffrey	Telecommunication Charges by Jeffrey Taub	\$14.91
3/4/2022	Fisher David J.	Telecommunication Charges by David Fisher	\$27.52
3/4/2022	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	8.78



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3/7/2022	Fisher David J.	Telecommunication Charges by David Fisher	\$12.16
3/16/2022	Khvatskaya Mariya	Telecommunication Charges by Mariya Khvatskaya	\$3.44
3/17/2022	Khvatskaya Mariya	Telecommunication Charges by Mariya Khvatskaya	\$6.30
3/31/2022	Khvatskaya Mariya	Telecommunication Charges by Mariya Khvatskaya	\$2.32
<b>Subtotal</b>			<b>\$88.94</b>

**Transcript Fees**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
4/27/2022	Kane Wendy	Veritext New York Reporting Co., A Veritext Company	\$121.20
<b>Subtotal</b>			<b>\$121.20</b>

**Westlaw Online Research**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
4/21/2022	Blabey David E.	Westlaw Online Research	\$107.66
<b>Subtotal</b>			<b>\$107.66</b>
<b>TOTAL</b>			<b>\$6,826.64</b>

**Exhibit E**

Summary of Time by Billing Category

<b>PURDUE PHARMA L.P., ET AL. AD HOC COMMITTEE</b>			
<b>Time by Billing Category for February 1, 2022 through April 30, 2022</b>			
<b><u>Matter Number</u></b>	<b><u>Matter Name</u></b>	<b><u>Hours</u></b>	<b><u>Fees (\$)</u></b>
072952-00003	Business Operations	45.20	\$59,575.50
072952-00004	Case Administration	5.10	\$2,493.00
072952-00006	Employment and Fee Applications	59.60	\$50,294.00
072952-00008	Litigation	762.90	\$896,635.50
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	162.50	\$216,679.00
072952-00010	Non-Working Travel <sup>1</sup>	4.00	\$6,160.00
072952-00011	Plan and Disclosure Statement	240.70	\$349,930.50
<b>Subtotal</b>		<b>1,280.00</b>	<b>\$1,581,767.50</b>
<b>Less 50% Non-Working Travel</b>			<b>(\$3,080.00)</b>
<b><u>TOTAL</u></b>		<b>1,280.00</b>	<b><u>\$1,578,687.50</u></b>

<sup>1</sup> Non-working travel is billed at 50%.

**Exhibit F**

Final Detailed Time Records – Eighth Interim Fee Period

February 1, 2022 through April 30, 2022



**Kramer Levin**



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Ad Hoc Committee of Governmental and Other  
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**FOR PROFESSIONAL SERVICES rendered through February 28, 2022.**

Fees	\$524,028.00
Disbursements and Other Charges	7,164.36
<b>TOTAL BALANCE DUE</b>	<b>\$531,192.36</b>

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

Kramer Levin Naftalis & Frankel LLP  
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March 31, 2022  
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**MATTER SUMMARY**

**For professional services rendered through February 28, 2022 in connection with the following matters:**

<b>Matter</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Disbs</b>	<b>Total</b>
072952-00001	Asset Analysis and Recovery	\$0.00	\$7,164.36	<b>\$7,164.36</b>
072952-00003	Business Operations	2,979.50	0.00	<b>2,979.50</b>
072952-00004	Case Administration	528.00	0.00	<b>528.00</b>
072952-00006	Employment and Fee Applications	14,553.00	0.00	<b>14,553.00</b>
072952-00008	Litigation	328,579.00	0.00	<b>328,579.00</b>
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	72,153.50	0.00	<b>72,153.50</b>
072952-00011	Plan and Disclosure Statement	105,235.00	0.00	<b>105,235.00</b>
<b>Subtotal</b>		<b>524,028.00</b>	<b>7,164.36</b>	<b>531,192.36</b>
<b>TOTAL CURRENT INVOICE</b>				<b>\$531,192.36</b>



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**Asset Analysis and Recovery**

**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Courier Services	\$32.88
Data Hosting Charges	2,100.69
Lexis Online Research	2,033.33
Pacer Online Research	132.00
Photocopying	156.00
Postage	8.16
Transcript Fees	102.00
Westlaw Online Research	2,599.30
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$7,164.36</b>



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**Business Operations**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	1.30	\$2,190.50
Ringer, Rachael L.	Partner	0.60	789.00
<b>TOTAL FEES</b>		<b>1.90</b>	<b>\$2,979.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/24/2022	Eckstein, Kenneth H.	Review HRT materials and call re same with Houlihan (0.7).	0.70	\$1,179.50
2/25/2022	Ringer, Rachael L.	Attend portion of call with Debtors re: HRT (0.6).	0.60	789.00
2/25/2022	Eckstein, Kenneth H.	Attend call with Debtors re HRT (0.6).	0.60	1,011.00
<b>TOTAL</b>			<b>1.90</b>	<b>\$2,979.50</b>



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**Case Administration**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Kane, Wendy	Paralegal	1.10	\$528.00
<b>TOTAL FEES</b>		<b>1.10</b>	<b>\$528.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/4/2022	Kane, Wendy	Calls and emails w/ vendor re transcript.	0.20	\$96.00
2/7/2022	Kane, Wendy	Review dockets and update internal case records (0.4).	0.40	192.00
2/23/2022	Kane, Wendy	Review dockets and update internal case records.	0.20	96.00
2/28/2022	Kane, Wendy	Review docket and update case calendar; register KL team for March 2 hearing.	0.30	144.00
<b>TOTAL</b>			<b>1.10</b>	<b>\$528.00</b>



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**Employment and Fee Applications**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	1.80	\$2,187.00
Gange, Caroline	Associate	8.20	9,102.00
Kane, Wendy	Paralegal	6.40	3,072.00
Kindler, Jacqueline	Paralegal	0.40	192.00
<b>TOTAL FEES</b>		<b>16.80</b>	<b>\$14,553.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/1/2022	Gange, Caroline	Review December fee statement for privilege/confidentiality and compliance with UST guidelines (0.6); review and coordinate w/ other AHC professionals re filing fee statements (0.5).	1.10	\$1,221.00
2/1/2022	Kane, Wendy	Revise December fee statement per attorney comments.	0.40	192.00
2/2/2022	Gange, Caroline	Emails w/ D. Blabey and R. Ringer re fee statements (0.2); further review November/December fee statements for privilege and confidentiality and compliance with UST guidelines (1.2).	1.40	1,554.00
2/2/2022	Kane, Wendy	Review December fee statement for compliance with UST guidelines and local rules (1.8); email C. Gange re same (0.1).	1.90	912.00



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**Employment and Fee Applications**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/4/2022	Kane, Wendy	File Gilbert twenty-sixth and twenty-seventh monthly fee statements (0.4).	0.40	192.00
2/14/2022	Blabey, David E.	Review November and December fee statements.	1.80	2,187.00
2/14/2022	Gange, Caroline	Edit November and December fee statements and finalize for filing.	1.00	1,110.00
2/14/2022	Kane, Wendy	Revise fee statements per attorney comments (0.4); emails w/ C. Gange and F. Arias re same (0.1); revise November fee statement and exhibits (0.5).	1.00	480.00
2/15/2022	Gange, Caroline	Coordinate filing KL November and December fee statements.	0.20	222.00
2/16/2022	Kane, Wendy	Prepare December fee statement and exhibits (0.9); emails w/ C. Gange re same (0.1); file and service of same (0.4).	1.40	672.00
2/23/2022	Gange, Caroline	Review and edit January fee statement for privilege/confidentiality and compliance with UST guidelines.	1.30	1,443.00
2/24/2022	Gange, Caroline	Review January fee statement for privilege/confidentiality and compliance with UST guidelines.	1.20	1,332.00
2/24/2022	Kane, Wendy	Review January fee statement for compliance with UST guidelines and local rules; email C. Gange re same.	0.90	432.00
2/25/2022	Gange, Caroline	Coordinate filing of AHC professional invoices.	0.30	333.00



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**Employment and Fee Applications**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/25/2022	Kindler, Jacqueline	File fee statements and correspondence w/ KL team and co-counsel re same.	0.40	192.00
2/28/2022	Gange, Caroline	Review January fee statement for privilege/confidentiality and compliance with UST guidelines.	1.70	1,887.00
2/28/2022	Kane, Wendy	Prepare Houlihan November and December fee statements for filing; file same and serve.	0.40	192.00
<b>TOTAL</b>			<b>16.80</b>	<b>\$14,553.00</b>





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**Litigation**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	79.00	\$95,985.00
Eckstein, Kenneth H.	Partner	12.00	20,220.00
Ringer, Rachael L.	Partner	1.40	1,841.00
Rosenbaum, Jordan M.	Partner	0.40	560.00
Wagner, Jonathan M.	Partner	9.60	14,400.00
Shifer, Joseph A.	Spec Counsel	25.10	29,994.50
Gange, Caroline	Associate	67.00	74,370.00
Kelly, Declan	Associate	72.80	57,148.00
Lennard, Daniel	Associate	18.90	22,396.50
Kane, Wendy	Paralegal	24.30	11,664.00
<b>TOTAL FEES</b>		<b>310.50</b>	<b>\$328,579.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/1/2022	Rosenbaum, Jordan M.	Attend portion of hearing on PI motion.	0.40	\$560.00



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**Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/1/2022	Blabey, David E.	Draft statement of the case for appellate brief (6.3); edits to preliminary statement (1.8); emails with W. Kane and S. Ford re Form C (0.3); attend hearing on preliminary injunction extension (0.6); call with D. Lennard re appeal research (0.2).	9.20	11,178.00
2/1/2022	Eckstein, Kenneth H.	Prepare for (0.6) and attend hearing on PI motion (0.6).	1.20	2,022.00
2/1/2022	Shifer, Joseph A.	Attend PI hearing (0.6), research re claims issues to revise memo re same (3.9).	4.50	5,377.50
2/1/2022	Lennard, Daniel	Call with D. Blabey re appeal (0.2); legal research for appeal brief (6.6).	6.80	8,058.00
2/1/2022	Kelly, Declan	Attend preliminary injunction extension hearing (0.6); draft memo on appellate issues (6.9); research appellate rules and update memo (1.1).	8.60	6,751.00
2/1/2022	Gange, Caroline	Attend preliminary injunction hearing (0.6); review pleadings re same (0.7); emails w/ AHC professionals re same (0.3).	1.60	1,776.00



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**Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/1/2022	Kane, Wendy	Numerous emails w/ D. Blabey and S. Ford re Form C (0.4); call w/ S. Ford re same (0.1); review all exhibits to Form C for searchability (0.6); revise exhibit PDF print method per court (0.4); further emails w/ S. Ford (0.2); coordinate with office services re scanning exhibits (0.2); page proof check and OCR all scanned exhibits and prepare same for filing (0.9).	2.80	1,344.00
2/2/2022	Blabey, David E.	Emails with D. Kelly and D. Lennard re appellate brief (0.4); draft best interests section of brief (3.3); draft due process section of brief (3.1); review case law on standard and scope of appellate review and discretion (2.5).	9.30	11,299.50
2/2/2022	Shifer, Joseph A.	Research re claims issues (4.1), revise memo re same (0.7).	4.80	5,736.00
2/2/2022	Lennard, Daniel	Legal research re jurisdiction issues on appeal to Second Circuit.	0.90	1,066.50
2/2/2022	Kelly, Declan	Draft memo on appellate issues (6.2); research appellate procedure (0.3).	6.50	5,102.50
2/2/2022	Gange, Caroline	Further research re and edits to memo re claims issues (4.0); emails w/ J. Shifer re same (0.3).	4.30	4,773.00
2/3/2022	Wagner, Jonathan M.	Review motion to extend preliminary injunction.	0.10	150.00



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**Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/3/2022	Blabey, David E.	Draft remaining sections of appellate brief (5.1); review Mallinckrodt decision (0.4); review and edit appellate brief (1.5); emails with KL team re preliminary injunction motion (0.3).	7.30	8,869.50
2/3/2022	Shifer, Joseph A.	Emails with D. Blabey re claims issues memo (0.2), revisions to same (8.0), emails with C. Gange re same (0.5).	8.70	10,396.50
2/3/2022	Kelly, Declan	Draft appellate chart (1.1).	1.10	863.50
2/3/2022	Gange, Caroline	Review documents re insurance adversary proceeding (5.0); emails w/ D. Blabey and J. Hudson re same (0.3); review PI extension motion (0.5).	5.80	6,438.00
2/3/2022	Gange, Caroline	Further research re client memo re claims issues (1.8); emails w/ J. Shifer re same (0.2).	2.00	2,220.00
2/4/2022	Blabey, David E.	Review Robbins Russell email re brief (0.2); call with Robbins Russell team re edits to brief (0.8) and emails to K. Eckstein re same (0.2); edits to appellate brief (1.6).	2.80	3,402.00
2/4/2022	Shifer, Joseph A.	Revise claims issues memo (4.8), emails with C. Gange and D. Blabey re same (1.0).	5.80	6,931.00



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### Litigation

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/4/2022	Gange, Caroline	Review docs re insurance adversary proceeding (4.5); call w/ D. Kelly re same (0.2); legal research re client next steps memo (0.6); emails w/ J. Shifer re same (0.3); draft and edit memo (3.1).	8.70	9,657.00
2/4/2022	Lennard, Daniel	Review draft appeal brief and cite-check same.	1.00	1,185.00
2/4/2022	Kelly, Declan	Calls w/ C. Gange re: doc review (1.0); review documents re insurance adversary (3.9).	4.90	3,846.50
2/6/2022	Blabey, David E.	Call with Debtor, MSGE and UCC counsel re appellate briefs (0.8); incorporate comments to brief from Robbins Russell (3.5).	4.30	5,224.50
2/6/2022	Eckstein, Kenneth H.	Call with appellants re Second Circuit briefing (0.8); review draft brief, comment (1.4).	2.20	3,707.00
2/7/2022	Blabey, David E.	Review and comment on J. Shifer and C. Gange memo on claims issues (1.2).	1.20	1,458.00
2/7/2022	Blabey, David E.	Review and comment on Robbins Russell turn of the appellate brief (1.7); exchange multiple emails with co-counsel and DPW team re finalizing the brief and appendix (0.7).	2.40	2,916.00
2/7/2022	Eckstein, Kenneth H.	Review and comment on draft appellate brief (1.5).	1.50	2,527.50
2/7/2022	Shifer, Joseph A.	Review D. Blabey comments to memo (0.4), emails with D. Blabey and C. Gange re same (0.2).	0.60	717.00



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### Litigation

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/7/2022	Kelly, Declan	Review documents re insurance adversary (1.0).	1.00	785.00
2/7/2022	Lennard, Daniel	Review and edit appeal brief (1.2); communications with appeal litigation team re brief, record, and appendix (0.3).	1.50	1,777.50
2/7/2022	Gange, Caroline	Review/edit memo re claims (2.8); emails w/ D. Blabey and J. Shifer re same (0.3).	3.10	3,441.00
2/8/2022	Blabey, David E.	Call with KL team re finalizing brief (0.2) and emails with team re same (0.2); multiple emails with co-counsel re finalizing brief (0.5); incorporate edits to brief from clients and co-counsel (5.3).	6.20	7,533.00
2/8/2022	Shifer, Joseph A.	Review revised memo (0.7).	0.70	836.50
2/8/2022	Kelly, Declan	Review documents re insurance adversary (0.8).	0.80	628.00
2/8/2022	Lennard, Daniel	Call with litigation appeal team re filing and brief prep (0.2); prep for same (0.6); attend call with Counsel Press re same (0.2).	1.00	1,185.00
2/8/2022	Gange, Caroline	Review and cite check Second Circuit draft brief (4.7), call w/ KL team re same (0.2), emails w/ KL team re: same (0.2).	5.10	5,661.00
2/8/2022	Kelly, Declan	Call re: appeal prep w/ D. Blabey, D. Lennard, C. Gange, W. Kane (0.2); review cites in brief (0.5).	0.70	549.50



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/8/2022	Kane, Wendy	Call w/ KL team re appellate brief (0.2); call w/ Counsel Press re same (0.2); call w/ D. Blabey, D. Lennard and Counsel Press re appellate brief (0.2); review cross appeal and prepare updated cover sheet for brief (0.3); review brief and bluebook cites (0.7); email D. Kelly re same (0.1); emails w/ S. Ford and Counsel Press re brief (0.5).	2.20	1,056.00
2/9/2022	Wagner, Jonathan M.	Review appeal briefs.	1.50	2,250.00
2/9/2022	Blabey, David E.	Review and edit appellate brief (1.3); review debtors' brief (2.0) and UCC's brief (1.0); further edits to AHC's brief (2.0); call with K. Eckstein re same (0.3); review case law on vacatur (0.8).	7.40	8,991.00
2/9/2022	Eckstein, Kenneth H.	Review and comment on appellate brief (1.2); call with D. Blabey re same (0.3).	1.50	2,527.50
2/9/2022	Kelly, Declan	Cite check Second Circuit draft brief (4.7), emails w/ KL team re: same (0.4).	5.10	4,003.50
2/9/2022	Kelly, Declan	Review documents re insurance adversary (3.0).	3.00	2,355.00
2/9/2022	Lennard, Daniel	Review brief and joint and special appendix lists (2.0); communications with KL team re same (0.5).	2.50	2,962.50
2/9/2022	Gange, Caroline	Review docs for insurance adversary proceeding (2.5); emails w/ J. Hudson re litigation adversary issues (0.4).	2.90	3,219.00



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**Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/9/2022	Kane, Wendy	Calls and emails w/ D. Lennard re joint appendix (0.3); emails w/ D. Blabey and Counsel Press re brief (0.2); prepare spreadsheet of designations for joint appendix and special appendix (1.6); prepare notices of appearance for R. Ringer and D. Blabey (0.3); emails w/ S. Ford re same and Counsel Press re appearances for co-counsel (0.2); proof cover from Counsel Press and send comments (0.1); revise record designation spreadsheet to include JX designations (0.8).	3.50	1,680.00
2/10/2022	Wagner, Jonathan M.	Review draft appeal briefs.	1.00	1,500.00
2/10/2022	Blabey, David E.	Email with co-counsel re brief (0.5) and follow-up with K. Eckstein and R. Ringer (0.5); call with Debtors' counsel re briefs (0.5); edits to brief (2.4); call with Akin and DPW re brief (0.4) and emails with Robbins Russell re same (0.5); call with D. Lennard and W. Kane re briefing (0.2); proof and edit brief (2.3); incorporate comments to brief from co-counsel (2.5); emails with co-counsel and FTI re brief (0.5).	10.30	12,514.50
2/10/2022	Eckstein, Kenneth H.	Review appellate brief, correspond re same (0.8).	0.80	1,348.00
2/10/2022	Eckstein, Kenneth H.	Review issues re PI (0.4).	0.40	674.00
2/10/2022	Lennard, Daniel	Preparing appeal brief and appendices for filing (1.1); call with D. Blabey and W. Kane re filing and service (0.2); calls with Counsel Press re same (0.2).	1.50	1,777.50





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**Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/10/2022	Kelly, Declan	Review documents re insurance adversary (4.8).	4.80	3,768.00
2/10/2022	Kelly, Declan	Insert Special Appendix cites to draft brief (2.2).	2.20	1,727.00
2/10/2022	Gange, Caroline	Review docs for insurance adversary proceeding (3.0); review issues re 2nd circuit brief (0.4); emails w/ D. Blabey re same (0.2).	3.60	3,996.00
2/10/2022	Kane, Wendy	Call w/ D. Blabey and D. Lennard re brief (0.2); call w/ Counsel Press (0.2); further revise joint appendix designations (0.5); review emails from KL team and debtor's counsel re same (0.2); emails w/ D. Lennard re same (0.1); calls and emails w/ co-counsel and S. Ford re notices of appearance (0.4); serve NOAs on pro se parties (0.2); review latest version of brief and update joint appendix designations (0.4); insert cover page on brief and format same (0.3); download special appendix materials and review (0.4); email KL team re AHC counsel and review docket for co-counsel appearances (0.1); compile filings referenced in AHC joint appendix designations (0.2); further revise joint appendix designations (0.2); emails w/ D. Blabey and D. Kelly re SPA cites and proof same in brief (0.8).	4.20	2,016.00
2/11/2022	Wagner, Jonathan M.	Review draft appeal briefs.	0.50	750.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/11/2022	Blabey, David E.	Call with Michigan AG's office (0.1) and exchange emails re same (0.2); edits to appellate brief (2.4); call with K. Eckstein re same (0.3); calls with FTI and Gilbert re brief (0.3); review and final proof of brief (0.9); review other appellants' filed briefs (1.0).	5.20	6,318.00
2/11/2022	Eckstein, Kenneth H.	Review and comment on appellate brief (1.2), call w/ D. Blabey re same (0.3).	1.50	2,527.50
2/11/2022	Lennard, Daniel	Edit/review appeal brief and appendices (1.7), and coordinate filing and service of same (0.2).	1.90	2,251.50
2/11/2022	Gange, Caroline	Review brief (1.9); emails w/ KL team re same (0.3); emails w/ W. Kane re filing (0.2); review as-filed Second Circuit briefs (1.5); review docs re insurance adversary proceeding (3.5).	7.40	8,214.00
2/11/2022	Kelly, Declan	Review and edit draft brief (2.2); review final brief (0.3).	2.50	1,962.50
2/11/2022	Kelly, Declan	Review documents re insurance adversary (3.3).	3.30	2,590.50



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**Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/11/2022	Kane, Wendy	Review appellate brief cites (0.3); update joint appendix (0.4); emails w/ KL team re same (0.3); calls and emails w/ Counsel Press re same (0.2); emails w/ C. Gange and D. Kelly re filing of same (0.3); email D. Polk re special appendix (0.1); emails w/ Brown Rudnick re notice of appearance (0.2); proof brief cover and email Counsel Press re same (0.1); prepare table of authorities (0.8); emails w/ KL team re final formatting and internal references (0.2); review page numbering and update tables (0.4); revise placement of corp disclosure statement (0.2); coordinate filing with Counsel Press (0.2); prepare service list for joint appendix designations (0.9); finalize joint appendix designations (2.6); emails w/ D. Lennard re same (0.2); email all parties re joint appendix designations (0.2).	7.60	3,648.00
2/13/2022	Kelly, Declan	Draft summaries of Second Circuit briefs (2.3).	2.30	1,805.50
2/14/2022	Eckstein, Kenneth H.	Review appellate briefs, correspond re same (1.4).	1.40	2,359.00
2/14/2022	Kelly, Declan	Review documents re insurance adversary (6.6).	6.60	5,181.00
2/14/2022	Lennard, Daniel	Emails with Davis Polk and W. Kane re updating joint appendix list.	0.50	592.50
2/14/2022	Gange, Caroline	Review docs for insurance adversary proceeding.	4.00	4,440.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/14/2022	Kane, Wendy	Emails w/ D. Lennard re joint appendix designations (0.2); emails w/ Alix Partners re confirmation reserve (0.2); download documents with JX designations (1.3); review appeals docket and compile briefs (0.2); prepare binders of same (0.7); emails w/ litigation team re same (0.2); .	2.80	1,344.00
2/15/2022	Wagner, Jonathan M.	Review appeal briefs.	3.00	4,500.00
2/15/2022	Blabey, David E.	Emails with K. Eckstein re PI Committee's appellate brief.	0.70	850.50
2/15/2022	Kelly, Declan	Review documents re insurance adversary (5.9).	5.90	4,631.50
2/15/2022	Lennard, Daniel	Update joint appendix and communications with Davis Polk, D. Blabey, and W. Kane re same.	0.80	948.00
2/15/2022	Gange, Caroline	Review documents for insurance adversary proceeding.	5.20	5,772.00
2/15/2022	Kane, Wendy	Emails w/ D. Lennard and Davis Polk re joint appendix document designations (0.3); upload documents to David Polk site (0.2).	0.50	240.00
2/16/2022	Wagner, Jonathan M.	Review appeal briefs (1.3); review motion to extend preliminary injunction (0.2).	1.50	2,250.00
2/16/2022	Blabey, David E.	Research relating to issues raised by personal injury claimants in appellate brief.	4.40	5,346.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/16/2022	Ringer, Rachael L.	Call with Gilbert team re: document review and adversary proceeding (0.6).	0.60	789.00
2/16/2022	Kelly, Declan	Review documents re insurance adversary (6.4).	6.40	5,024.00
2/16/2022	Gange, Caroline	Review documents for insurance adversary proceeding (4.7); review motion to extend PI (0.6).	5.30	5,883.00
2/17/2022	Blabey, David E.	Attend portion of PI omnibus hearing.	0.60	729.00
2/17/2022	Eckstein, Kenneth H.	Prep for (0.3) and attend hearing re PI extension (1.2).	1.50	2,527.50
2/17/2022	Kelly, Declan	Attend hearing on preliminary injunction (1.2); draft update re: same (0.1).	1.30	1,020.50
2/17/2022	Kelly, Declan	Review documents re insurance adversary (1.6).	1.60	1,256.00
2/17/2022	Gange, Caroline	Attend hearing on PI extension (1.2); review documents for insurance adversary proceeding and communications with D. Kelly re same (5.3); attend call w/ Gilbert and D. Blabey re insurance adversary proceeding (0.3).	6.80	7,548.00
2/18/2022	Lennard, Daniel	Communications with Davis Polk re joint appendix update.	0.50	592.50
2/18/2022	Kelly, Declan	Review documents re insurance adversary (1.2).	1.20	942.00
2/21/2022	Blabey, David E.	Review amicus motions.	0.20	243.00
2/22/2022	Wagner, Jonathan M.	Review amicus briefs.	1.00	1,500.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/22/2022	Blabey, David E.	Exchange emails regarding and review draft summary of amicus briefs.	0.30	364.50
2/22/2022	Gange, Caroline	Emails w/ KL team re insurance adversary doc review status and review draft privilege log.	0.50	555.00
2/22/2022	Kelly, Declan	Summarize amicus briefs (2.2); revise summaries (0.4).	2.60	2,041.00
2/22/2022	Kane, Wendy	Review second circuit docket and update internal case records (0.2); email C. Gange re amicus briefs and send zip file of same (0.1); prepare binder for J. Wagner re same (0.4).	0.70	336.00
2/23/2022	Wagner, Jonathan M.	Review amicus briefs.	1.00	1,500.00
2/23/2022	Gange, Caroline	Emails w/ J. Hudson re insurance adversary proceeding doc review.	0.30	333.00
2/27/2022	Blabey, David E.	Privilege review of insurance related documents.	1.50	1,822.50
2/27/2022	Gange, Caroline	Emails w/ D. Blabey re insurance adversary proceeding doc review.	0.10	111.00
2/28/2022	Blabey, David E.	Call with C. Gange, R. Ringer and D. Kelly re insurance-related document review (0.4); discuss with R. Ringer re same (0.4); second level review of docs for privilege (4.9).	5.70	6,925.50
2/28/2022	Ringer, Rachael L.	Call with KL team re: insurance doc review issues (0.4), calls and coordination with D. Blabey re: same (0.4).	0.80	1,052.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/28/2022	Kelly, Declan	Call w/ D. Blabey, R. Ringer, C. Gange re: insurance adversary proceeding document review.	0.40	314.00
2/28/2022	Gange, Caroline	Call w/ KL team re insurance adversary proceeding document review and review docs re same (0.3).	0.30	333.00
<b>TOTAL</b>			<b>310.50</b>	<b>\$328,579.00</b>



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	5.60	\$6,804.00
Eckstein, Kenneth H.	Partner	19.50	32,857.50
Fisher, David J.	Partner	3.30	5,214.00
Ringer, Rachael L.	Partner	6.90	9,073.50
Shifer, Joseph A.	Spec Counsel	2.40	2,868.00
Gange, Caroline	Associate	11.20	12,432.00
Kelly, Declan	Associate	3.70	2,904.50
<b>TOTAL FEES</b>		<b>52.60</b>	<b>\$72,153.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/1/2022	Blabey, David E.	Attend portion of AHC working group call.	0.60	\$729.00
2/1/2022	Eckstein, Kenneth H.	Attend Working Group call (1.0).	1.00	1,685.00
2/1/2022	Gange, Caroline	Draft bridge order update and other appeal docket updates for AHC clients (0.5); email same to D. Blabey and R. Ringer (0.1).	0.60	666.00
2/2/2022	Ringer, Rachael L.	Attend AHC call (0.5).	0.50	657.50
2/2/2022	Fisher, David J.	Attend weekly Ad-Hoc Committee conference call.	0.50	790.00
2/2/2022	Ringer, Rachael L.	Prep for AHC call (0.7).	0.70	920.50





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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/2/2022	Blabey, David E.	Attend weekly AHC call (0.5).	0.50	607.50
2/2/2022	Eckstein, Kenneth H.	Prep for (0.5) and attend AHC call (0.5).	1.00	1,685.00
2/2/2022	Shifer, Joseph A.	Attend AHC call (0.5).	0.50	597.50
2/2/2022	Gange, Caroline	Attend weekly AHC meeting (0.5); draft AHC update emails re fees (0.9).	1.40	1,554.00
2/2/2022	Kelly, Declan	Attend AHC meeting (0.5).	0.50	392.50
2/3/2022	Ringer, Rachael L.	Attend portion of catch-up call re: working group issues (0.6).	0.60	789.00
2/3/2022	Blabey, David E.	Attend working group call (0.8).	0.80	972.00
2/3/2022	Eckstein, Kenneth H.	Attend Working Group discussion (0.8).	0.80	1,348.00
2/3/2022	Gange, Caroline	Draft client update email re PI extension and circulate to D. Blabey and R. Ringer.	0.40	444.00
2/8/2022	Fisher, David J.	Attend weekly Committee meeting.	1.50	2,370.00
2/8/2022	Eckstein, Kenneth H.	Attend Working Group call (1.0); call with S. Gilbert, Marc K, Sheila (0.6); prep for AHC meeting (1.1) and attend AHC meeting (1.6).	4.30	7,245.50
2/8/2022	Ringer, Rachael L.	Attend working group call (0.6), review/email with AHC re: second mediator report (0.3), attend portion of AHC call (1.0).	1.90	2,498.50
2/8/2022	Blabey, David E.	Attend working group call and follow-up email to K. Eckstein re same (1.0).	1.00	1,215.00



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/8/2022	Shifer, Joseph A.	Attend portion of weekly AHC call (0.6).	0.60	717.00
2/8/2022	Kelly, Declan	Prep for (0.3) and attend AHC call (1.6).	1.90	1,491.50
2/9/2022	Gange, Caroline	Attend portion of weekly AHC call.	1.30	1,443.00
2/10/2022	Eckstein, Kenneth H.	Call with Working Group and former NCSG re mediation (0.8); attend call with Working Group, 15, Debtor and Judge Chapman re mediation (1.5).	2.30	3,875.50
2/10/2022	Ringer, Rachael L.	Attend call with working group re: open issues (0.5).	0.50	657.50
2/10/2022	Blabey, David E.	Attend working group call (0.5).	0.50	607.50
2/10/2022	Eckstein, Kenneth H.	Prep for (0.1) and attend Working Group call (0.5).	0.60	1,011.00
2/10/2022	Ringer, Rachael L.	Call with certain AHC members re: Purdue appeal pleading (0.5).	0.50	657.50
2/11/2022	Eckstein, Kenneth H.	Attend Working Group call to update on mediation discussions (1.0).	1.00	1,685.00
2/13/2022	Gange, Caroline	Draft and circulate update re appellate briefs to D. Blabey and R. Ringer.	2.10	2,331.00
2/14/2022	Blabey, David E.	Review and edit summary to clients on Second Circuit pleadings.	0.30	364.50
2/14/2022	Gange, Caroline	Circulate appellate brief update to AHC.	0.10	111.00



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/15/2022	Blabey, David E.	Attend portion of working group call.	0.60	729.00
2/15/2022	Ringer, Rachael L.	Attend portion of working group update call (0.8).	0.80	1,052.00
2/15/2022	Eckstein, Kenneth H.	Attend Working Group call (1.0).	1.00	1,685.00
2/16/2022	Fisher, David J.	Attend weekly Ad Hoc call.	0.80	1,264.00
2/16/2022	Eckstein, Kenneth H.	Attend AHC meeting (0.8); correspond re mediation and exchange emails with Working Group and Judge Chapman (1.6).	2.40	4,044.00
2/16/2022	Blabey, David E.	Prep for (0.5) and attend weekly AHC call (0.8).	1.30	1,579.50
2/16/2022	Shifer, Joseph A.	Attend AHC meeting.	0.80	956.00
2/16/2022	Kelly, Declan	Attend AHC meeting (0.8).	0.80	628.00
2/17/2022	Eckstein, Kenneth H.	Attend Working Group call (0.6).	0.60	1,011.00
2/17/2022	Gange, Caroline	Draft and circulate AHC update re PI hearing and motion to further extend PI.	0.30	333.00
2/22/2022	Ringer, Rachael L.	Attend portion of AHC working group call (0.5).	0.50	657.50
2/22/2022	Eckstein, Kenneth H.	Attend Working Group call (1.0).	1.00	1,685.00
2/22/2022	Gange, Caroline	Draft and circulate AHC updates re amicus briefs and professional fees.	2.90	3,219.00
2/23/2022	Fisher, David J.	Attend Ad Hoc Committee meeting.	0.50	790.00
2/23/2022	Ringer, Rachael L.	Attend weekly AHC call (0.4).	0.40	526.00



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/23/2022	Eckstein, Kenneth H.	Prep for (0.5) and attend AHC weekly call (0.5); attend Working Group call re Plan (1.0).	2.00	3,370.00
2/23/2022	Shifer, Joseph A.	Attend weekly AHC meeting.	0.50	597.50
2/23/2022	Kelly, Declan	Attend AHC meeting (0.5).	0.50	392.50
2/23/2022	Gange, Caroline	Prep for (0.2) and attend weekly AHC call (0.5).	0.70	777.00
2/24/2022	Ringer, Rachael L.	Attend portion of working group call (0.5).	0.50	657.50
2/24/2022	Eckstein, Kenneth H.	Attend Working Group call re Plan analysis (1.5).	1.50	2,527.50
2/28/2022	Gange, Caroline	Attend AHC meeting re mediation (1.2); emails w/ KL team re prep for same (0.2).	1.40	1,554.00
<b>TOTAL</b>			<b>52.60</b>	<b>\$72,153.50</b>



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**Plan and Disclosure Statement**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	2.80	\$3,402.00
Eckstein, Kenneth H.	Partner	43.60	73,466.00
Fisher, David J.	Partner	1.70	2,686.00
Ringer, Rachael L.	Partner	4.70	6,180.50
Rogoff, Adam C.	Partner	3.10	4,820.50
Wagner, Jonathan M.	Partner	0.20	300.00
Shifer, Joseph A.	Spec Counsel	2.30	2,748.50
Daniels, Elan	Associate	0.80	956.00
Gange, Caroline	Associate	5.50	6,105.00
Kelly, Declan	Associate	5.70	4,474.50
Kane, Wendy	Paralegal	0.20	96.00
<b>TOTAL FEES</b>		<b>70.60</b>	<b>\$105,235.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/1/2022	Rogoff, Adam C.	Continue analysis re Plan structures; emails and coordination with K. Eckstein, D. Blabey, C. Gange, R. Ringer and J. Shifer re status.	0.40	\$622.00



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**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/1/2022	Eckstein, Kenneth H.	Call with S. Burian re Purdue plan (0.8); call with S. Burian, G. Coutts re plan model (0.7).	1.50	2,527.50
2/1/2022	Gange, Caroline	Legal research for client memo re next steps on plan.	1.80	1,998.00
2/2/2022	Rogoff, Adam C.	Continue analysis re Plan structures; emails and coordination with K. Eckstein, D. Blabey, C. Gange, R. Ringer and J. Shifer re status.	0.50	777.50
2/2/2022	Eckstein, Kenneth H.	Calls with all parties re mediation (1.4); call w/ co-counsel re Plan analysis (1.0).	2.40	4,044.00
2/3/2022	Rogoff, Adam C.	Continue analysis re Plan structures; emails and coordination with K. Eckstein and D. Blabey re status.	0.50	777.50
2/3/2022	Eckstein, Kenneth H.	Calls re mediation (0.7); calls re Plan analysis (1.0).	1.70	2,864.50
2/4/2022	Rogoff, Adam C.	Continue analysis re Plan structures; emails and coordination with K. Eckstein, D. Blabey, C. Gange and clients re status.	0.50	777.50
2/4/2022	Eckstein, Kenneth H.	Calls with M. Huebner re mediation (1.2), call with S. Gilbert re same (0.6).	1.80	3,033.00
2/7/2022	Eckstein, Kenneth H.	Calls and correspond re mediation (1.0); call with A. Preis re appeal, mediation, plan (0.5).	1.50	2,527.50



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**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/8/2022	Rogoff, Adam C.	Continue analysis re Plan structures; emails and coordination with K. Eckstein, D. Blabey, C. Gange and clients re status.	0.40	622.00
2/8/2022	Wagner, Jonathan M.	Review Mediator's report and subsequent order.	0.20	300.00
2/9/2022	Eckstein, Kenneth H.	Call with G. Uzzi and B. Rosen re Plan (1.4); call with C. Shore re same (0.6) call with DPW re same(0.4); correspond w/ co-counsel re mediation, Plan and related issues (1.4).	3.80	6,403.00
2/9/2022	Fisher, David J.	Communications regarding IAC restructuring with Debevoise; review potential new settlement terms.	0.40	632.00
2/10/2022	Rogoff, Adam C.	Emails and coordination with K. Eckstein and D. Blabey re status.	0.20	311.00
2/11/2022	Rogoff, Adam C.	Emails and coordination with K. Eckstein, C. Gange, and D. Blabey re Plan status.	0.20	311.00
2/14/2022	Eckstein, Kenneth H.	Calls re mediation updates with M. Huebner, S. Gilbert, D. Blabey (1.5).	1.50	2,527.50
2/15/2022	Eckstein, Kenneth H.	Call with S. Burian re plan and deal options (0.8); call with M. Huebner re mediation (0.5); calls with S. Gilbert re same(1.2).	2.50	4,212.50
2/17/2022	Eckstein, Kenneth H.	Attend mediation session with Judge Chapman and Working Group (1.0).	1.00	1,685.00



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**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/18/2022	Rogoff, Adam C.	Emails and coordination with K. Eckstein, R. Ringer, and D. Blabey re Plan status.	0.20	311.00
2/18/2022	Eckstein, Kenneth H.	Call with Houlihan, S. Gilbert re Plan and settlement issues (1.0); calls w/ DPW re mediation (0.8); review mediators report (1.2).	3.00	5,055.00
2/18/2022	Ringer, Rachael L.	Call with AHC advisors re: next steps on plan (0.8), emails with AHC re: mediators report (0.3).	1.10	1,446.50
2/18/2022	Kelly, Declan	Review mediator report.	0.30	235.50
2/22/2022	Eckstein, Kenneth H.	Calls and correspond w/ company, UCC, AHC, MSGE re Plan and mediation(1.4); review Plan analysis; (0.8); correspond with S. Gilbert, M. Huebner, A. Preis, and HL re settlement (1.5).	3.70	6,234.50
2/22/2022	Fisher, David J.	Review various emails as to case and settlement issues.	0.40	632.00
2/23/2022	Eckstein, Kenneth H.	Review FAs Plan model and comment (1.2); call with M. Huebner, A. Preis, S. Gilbert re prep for group call (0.7); attend group call with Debtor, UCC, AHC, MSGE re settlement (1.3).	3.20	5,392.00
2/23/2022	Rogoff, Adam C.	Emails and coordination with K. Eckstein, D. Blabey re status (0.2).	0.20	311.00
2/23/2022	Fisher, David J.	Review Existing Settlement Agreement and related documents in anticipation of updated Settlement (0.7); communications with KL team regarding same and status (0.2).	0.90	1,422.00





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**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/23/2022	Ringer, Rachael L.	Call with Debtors re: status of mediation and next steps (1.0).	1.00	1,315.00
2/24/2022	Eckstein, Kenneth H.	Multiple calls re mediation with S. Gilbert, M. Huebner, J. Peacock, J. Guard (2.5).	2.50	4,212.50
2/25/2022	Eckstein, Kenneth H.	Multiple calls w/ all parties re mediation, term sheet, negotiations (3.4).	3.40	5,729.00
2/27/2022	Eckstein, Kenneth H.	Calls and correspond with J. Chapman, M. Huebner, S. Gilbert, J. Guard, A. Preis re settlement and mediation (2.1); call w/ D. Blabey, R. Ringer, C. Gange re settlement (0.4).	2.50	4,212.50
2/28/2022	Blabey, David E.	Call with K. Eckstein, R. Ringer and C. Gange re Sackler settlement (0.4); email D. Kelly re research in connection with same (0.1); calls with J. Shifer and E. Daniels re same (0.4) and multiple emails with E. Daniels, D. Eggermann and D. Kelly re same (0.7); discs with R. Ringer and K. Eckstein (0.5); call with K. Eckstein, J. Peacock, R. Ringer and S. Gilbert re same (0.7).	2.80	3,402.00
2/28/2022	Ringer, Rachael L.	Call with KL team re: case updates (0.4); calls with K. Eckstein, S. Gilbert, J. Peacock re: same (2.2).	2.60	3,419.00



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**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/28/2022	Eckstein, Kenneth H.	Call with Judge Chapman, S. Gilbert, J. Guard, J. Peacock re status of settlement, mediation, term sheet (2.0); follow up calls throughout the day re mediation (3.5); call with R. Ringer, D. Blabey re confidentiality, memo to AHC, follow up (1.4); follow up calls with J. Chapman (0.7).	7.60	12,806.00
2/28/2022	Shifer, Joseph A.	Research re settlement issues.	2.30	2,748.50
2/28/2022	Kelly, Declan	Research re: settlement issues (5.2), email D. Blabey re: same (0.2).	5.40	4,239.00
2/28/2022	Gange, Caroline	Attend call w/ K. Eckstein, D. Blabey and R. Ringer re mediation and next steps.	0.40	444.00
2/28/2022	Daniels, Elan	Call and email correspondence with D. Blabey regarding plan construct (0.8).	0.80	956.00
2/28/2022	Gange, Caroline	Legal research re mediation and settlement issues (3.1); discuss same w/ D. Kelly (0.2).	3.30	3,663.00
2/28/2022	Kane, Wendy	Research re decision and email D. Blabey re same.	0.20	96.00
<b>TOTAL</b>			<b>70.60</b>	<b>\$105,235.00</b>

**Kramer Levin**



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Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

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**FOR PROFESSIONAL SERVICES rendered through March 31, 2022.**

Fees	\$646,346.00
Disbursements and Other Charges	8,141.43
<b>TOTAL BALANCE DUE</b>	<b><u>\$654,487.43</u></b>

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas, New York, NY 10036  
T 212.715.9100 F 212.715.8000



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**MATTER SUMMARY**

**For professional services rendered through March 31, 2022 in connection with the following matters:**

<b>Matter</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Disbs</b>	<b>Total</b>
072952-00001	Asset Analysis and Recovery	\$0.00	\$8,141.43	<b>\$8,141.43</b>
072952-00003	Business Operations	7,471.50	0.00	<b>7,471.50</b>
072952-00004	Case Administration	1,626.00	0.00	<b>1,626.00</b>
072952-00006	Employment and Fee Applications	27,495.50	0.00	<b>27,495.50</b>
072952-00008	Litigation	327,472.00	0.00	<b>327,472.00</b>
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	107,960.50	0.00	<b>107,960.50</b>
072952-00011	Plan and Disclosure Statement	174,320.50	0.00	<b>174,320.50</b>
<b>Subtotal</b>		<b>646,346.00</b>	<b>8,141.43</b>	<b>654,487.43</b>
<b>TOTAL CURRENT INVOICE</b>				<b>\$654,487.43</b>



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**Asset Analysis and Recovery**

**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Color Copies	\$2.70
Courier Services	60.12
Data Hosting Charges	2,100.69
Lexis Online Research	2,612.81
Pacer Online Research	108.40
Photocopying	28.30
Postage	2.72
Telecommunication Charges	14.27
Transcript Fees	516.00
Westlaw Online Research	2,695.42
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$8,141.43</b>



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**Business Operations**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Bessonette, John	Partner	0.90	\$1,282.50
Eckstein, Kenneth H.	Partner	1.80	3,033.00
Ringer, Rachael L.	Partner	2.40	3,156.00
<b>TOTAL FEES</b>		<b>5.10</b>	<b>\$7,471.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/1/2022	Eckstein, Kenneth H.	Call with HL, FTI re HRT (0.6).	0.60	\$1,011.00
3/9/2022	Ringer, Rachael L.	Prep for and attend portion of hearing re: settlement (2.4).	2.40	3,156.00
3/14/2022	Bessonette, John	Review email re Naloxone / HRT additional funding; review prior emails and filings re same; emails with FTI and KL re same.	0.40	570.00
3/15/2022	Bessonette, John	Emails with FTI regarding Naloxone PHI initiative of Debtors.	0.50	712.50
3/16/2022	Eckstein, Kenneth H.	Review materials re HRT (0.6); call w/ M. Huebner re same (0.6).	1.20	2,022.00
<b>TOTAL</b>			<b>5.10</b>	<b>\$7,471.50</b>



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**Case Administration**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Kane, Wendy	Paralegal	2.20	\$1,056.00
Ranson, Jill L.	Other Tkpr	1.10	495.00
Thornton, Alexander	Other Tkpr	0.30	75.00
<b>TOTAL FEES</b>		<b>3.60</b>	<b>\$1,626.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/2/2022	Kane, Wendy	Emails w/ D. Blabey and S. Ford re notice of appearance in Canadian Municipalities appeal (0.2); call to case manager re same (0.2); prepare notices of appearance for K. Eckstein, R. Ringer, and D. Blabey (0.5); service of same (0.2).	1.10	\$528.00
3/2/2022	Thornton, Alexander	E-file appearances.	0.30	75.00
3/3/2022	Ranson, Jill L.	Prepare report on tagging in ViewPoint.	0.60	270.00
3/7/2022	Kane, Wendy	Review docket and update internal case records.	0.40	192.00
3/8/2022	Kane, Wendy	Review agenda and email w/ C. Gange and client re hearing; register KL team and clients for same.	0.50	240.00



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**Case Administration**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/10/2022	Ranson, Jill L.	Generate ViewPoint tag report and organize docs based on tags.	0.50	225.00
3/22/2022	Kane, Wendy	Register KL team for 3/23 hearing.	0.10	48.00
3/30/2022	Kane, Wendy	Review docket and update case calendar.	0.10	48.00
<b>TOTAL</b>			<b>3.60</b>	<b>\$1,626.00</b>





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**Employment and Fee Applications**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	0.70	\$1,179.50
Ringer, Rachael L.	Partner	1.80	2,367.00
Gange, Caroline	Associate	14.70	16,317.00
Kane, Wendy	Paralegal	15.90	7,632.00
<b>TOTAL FEES</b>		<b>33.10</b>	<b>\$27,495.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/1/2022	Gange, Caroline	Emails w/ fee examiner re seventh interim fees.	0.30	\$333.00
3/2/2022	Kane, Wendy	Review January fee statement for compliance with UST guidelines and local rules (1.4).	1.40	672.00
3/4/2022	Kane, Wendy	Draft seventh interim fee application (1.2); email C. Gange re same (0.1).	1.30	624.00
3/8/2022	Gange, Caroline	Further review January fee statement for privilege/confidentiality and compliance with UST guidelines.	1.10	1,221.00



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### Employment and Fee Applications

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/8/2022	Kane, Wendy	Revise January fee statement per attorney comments (0.4); review updated version of same and email C. Gange (0.3); review February fee statement for compliance with UST guidelines and local rules (1.1).	1.80	864.00
3/9/2022	Kane, Wendy	Review February fee statement for compliance with UST guidelines and local rules (1.3).	1.30	624.00
3/10/2022	Gange, Caroline	Draft and edit seventh interim fee application (1.4) and emails w/ W. Kane re same (0.1).	1.50	1,665.00
3/11/2022	Gange, Caroline	Draft Seventh Interim Fee App.	2.20	2,442.00
3/14/2022	Gange, Caroline	Review and edit KL fee application (1.0); emails w/ AHC profs re same (0.3).	1.30	1,443.00
3/15/2022	Gange, Caroline	Further review/revise interim fee application.	1.10	1,221.00
3/15/2022	Kane, Wendy	Prepare January fee statement and exhibits (0.7); revise seventh interim fee application to include fees and expenses and prepare exhibits re same (3.8); emails w/ C. Gange and billing re same (0.4).	4.90	2,352.00
3/16/2022	Gange, Caroline	Emails w/ KL team re fees and further edits to interim fee application.	2.00	2,220.00
3/17/2022	Ringer, Rachael L.	Review monthly fee statement to finalize for filing, review/comment on fee application to finalize for filing.	1.80	2,367.00



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**Employment and Fee Applications**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/17/2022	Eckstein, Kenneth H.	Review and comment on fee application (0.7).	0.70	1,179.50
3/17/2022	Gange, Caroline	Coordinate filing AHC professional interim fee apps (0.6); review and edit KL interim fee statement and prepare for filing (3.0); emails w/ R. Ringer and W. Kane re same (0.5).	4.10	4,551.00
3/17/2022	Kane, Wendy	Revise KL fee application (0.4); emails w/ C. Gange re same and filing other professionals' fee applications (0.3); file and serve fee applications and fee statements for Gilbert, Kramer Levin, Otterbourg, Houlihan and FTI (3.4).	4.10	1,968.00
3/22/2022	Kane, Wendy	Review updated fee statement.	0.30	144.00
3/29/2022	Gange, Caroline	Review January fee statement for privilege/confidentiality and compliance with UST guidelines.	1.10	1,221.00
3/31/2022	Kane, Wendy	Prepare fee statement and exhibits (0.7); email C. Gange re same (0.1).	0.80	384.00
<b>TOTAL</b>			<b>33.10</b>	<b>\$27,495.50</b>



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**Litigation**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	113.20	\$137,538.00
Eckstein, Kenneth H.	Partner	33.90	57,121.50
Fisher, David J.	Partner	4.30	6,794.00
Ringer, Rachael L.	Partner	0.70	920.50
Rosenbaum, Jordan M.	Partner	3.20	4,480.00
Wagner, Jonathan M.	Partner	7.30	10,950.00
Stoopack, Helayne O.	Counsel	0.50	620.00
Shifer, Joseph A.	Spec Counsel	8.30	9,918.50
Gange, Caroline	Associate	41.90	46,509.00
Kelly, Declan	Associate	60.40	47,414.00
Schinfeld, Seth F.	Associate	0.30	358.50
Kane, Wendy	Paralegal	10.10	4,848.00
<b>TOTAL FEES</b>		<b>284.10</b>	<b>\$327,472.00</b>



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**Litigation**

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/1/2022	Blabey, David E.	Review D. Kelly research and draft email to K. Eckstein re settlement-related arguments (1.0); research re same (1.0); further research and analysis re Sackler settlement (5.3); review Debtors' draft motion to approve settlement and exchange emails re same (0.6); call with K. Eckstein and email to Debtors re settlement (0.4).	8.30	\$10,084.50
3/1/2022	Blabey, David E.	Privilege review of docs for insurance adversary.	1.20	1,458.00
3/1/2022	Kelly, Declan	Research re: proposed settlement, emails w. D. Blabey re: same (0.7); research re: settlement standards (2.5); research re: settlement issues (3.1).	6.30	4,945.50
3/2/2022	Wagner, Jonathan M.	Review settlement term sheet.	0.50	750.00
3/2/2022	Blabey, David E.	Privilege review of documents for insurance adversary.	3.90	4,738.50
3/2/2022	Blabey, David E.	Review Sackler settlement term sheet (0.3); call with M. Tobak re appeals (0.2); attend portion of PI hearing (0.2).	0.70	850.50
3/2/2022	Eckstein, Kenneth H.	Prep for and attend court hearing (0.5).	0.50	842.50
3/2/2022	Shifer, Joseph A.	Attend hearing re PI (0.4).	0.40	478.00
3/2/2022	Gange, Caroline	Prep for (0.2) and attend hearing on preliminary injunction (0.4).	0.60	666.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/2/2022	Kelly, Declan	Research re: appellate jurisdiction (2.0); attend PI hearing, draft update re: same (0.4); review settlement term sheet (0.5).	2.90	2,276.50
3/3/2022	Wagner, Jonathan M.	Review pleadings on motion to approve settlement term sheet.	1.00	1,500.00
3/3/2022	Ringer, Rachael L.	Doc review for adversary proceeding (0.7).	0.70	920.50
3/3/2022	Blabey, David E.	Second level review of docs for insurance adversary proceeding.	2.40	2,916.00
3/3/2022	Blabey, David E.	Call with K. Eckstein re objection to Sackler settlement (1.0); review prior pleadings and transcripts in connection with potential objection (2.3); review and comment on Florida draft objection (0.9); multiple emails re same (0.6).	4.80	5,832.00
3/3/2022	Kelly, Declan	Review motion to authorize settlement (0.6); review transcripts for arguments re same (0.9); review Florida objection (0.8).	2.30	1,805.50
3/3/2022	Gange, Caroline	Finalize document review re adversary proceeding (1.1); review privilege log (0.2).	1.30	1,443.00
3/4/2022	Wagner, Jonathan M.	Review opposition to amendments to plan.	0.70	1,050.00



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### Litigation

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/4/2022	Blabey, David E.	Attend status conference on Sackler settlement motion (0.6); outline objection to Sackler settlement (1.7); review pleadings in connection with same (0.5); further outlining of objections (3.8) and exchange multiple emails with K. Eckstein re same (0.4); draft objection to settlement (3.2).	10.20	12,393.00
3/4/2022	Eckstein, Kenneth H.	Attend status conference re settlement hearing (0.7); review objection to same (0.8).	1.50	2,527.50
3/4/2022	Shifer, Joseph A.	Review Florida objection (0.8), emails with C. Gange re status conference (0.1).	0.90	1,075.50
3/4/2022	Schinfeld, Seth F.	Review objections to settlement from the States of Florida and West Virginia (0.2).	0.20	239.00
3/4/2022	Kelly, Declan	Attend status conference (0.7); review various objection filings (0.9).	1.60	1,256.00
3/4/2022	Gange, Caroline	Attend status conference re settlement hearing (0.7); legal research re objection to settlement (2.9); revise draft of same (1.1); emails w/ KL team re same (0.2).	4.90	5,439.00
3/5/2022	Blabey, David E.	Draft objection to Sackler settlement (2.5); call with K. Eckstein re same (0.1).	2.60	3,159.00



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**Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/6/2022	Blabey, David E.	Call with K. Eckstein re objection (0.3); draft objection to Sackler settlement (2.8); call with K. Eckstein re same (0.5); further edits to same (1.3); review K. Eckstein's edits (0.2) and further call with K. Eckstein (0.3); incorporate further edits and email to AHC (0.5).	5.90	7,168.50
3/7/2022	Wagner, Jonathan M.	Review objections to amendments to plan.	0.50	750.00
3/7/2022	Fisher, David J.	Review draft of Objection; communications with D. Blabey regarding same.	0.50	790.00
3/7/2022	Eckstein, Kenneth H.	Review and revise AHC pleading re settlement (2.8); calls and correspond re same (0.7); calls with S. Gilbert, E. Vonnegut, re same (2.0).	5.50	9,267.50
3/7/2022	Blabey, David E.	Call with K Eckstein re edits to settlement motion response (0.5); incorporate edits and email to AHC (0.4); multiple emails re tribal issues (0.4); further edits to incorporate client comments (1.3); further edits to the response to the motion (3.0).	5.60	6,804.00
3/7/2022	Stoopack, Helayne O.	Review draft of objection to motion re: settlement (0.5).	0.50	620.00
3/7/2022	Gange, Caroline	Review draft objection to PI settlement.	1.00	1,110.00
3/7/2022	Kelly, Declan	Review draft limited objection (0.6); review and circulate various state objections (1.9).	2.50	1,962.50





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### Litigation

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/8/2022	Wagner, Jonathan M.	Review objections to proposed amendments to plan.	0.80	1,200.00
3/8/2022	Fisher, David J.	Review and comment on Ad Hoc Committee Objection; communications with D. Blabey regarding same.	0.30	474.00
3/8/2022	Blabey, David E.	Edits to the response to the settlement motion to incorporate tribe comments (0.2); edits to and proof objection and incorporate multiple email comments from clients (2.2); review other responses to the settlement motion (0.6); draft talking points for hearing on settlement motion (2.5).	5.50	6,682.50
3/8/2022	Shifer, Joseph A.	Review objection to settlement (2.3).	2.30	2,748.50
3/8/2022	Kelly, Declan	Review final draft AHC objection (0.6); review objection filings (1.3); review and circulate Purdue filings, draft AHC update (0.5).	2.40	1,884.00
3/8/2022	Kane, Wendy	Email D. Blabey re limited objection to settlement (0.1); prepare same for filing and file same (0.4); service of same (0.4); send courtesy copy to Judge Drain (0.2).	1.10	528.00
3/9/2022	Wagner, Jonathan M.	Attend portion of hearing on settlement w/ holdout states.	2.00	3,000.00



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# **Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/9/2022	Eckstein, Kenneth H.	Review pleadings in prep for hearing (2.6); attend hearing re settlement (4.4); follow up correspondence w/ co-counsel re same (0.8).	7.80	13,143.00
3/9/2022	Blabey, David E.	Research and review case law for response to individual victims' appellate brief (1.5); edit talking points for hearing (1.2); attend hearing on Sackler settlement (4.4); emails with clients re same (0.2).	7.30	8,869.50
3/9/2022	Rosenbaum, Jordan M.	Attend portion of settlement hearing (3.2).	3.20	4,480.00
3/9/2022	Fisher, David J.	Attend portion of hearing regarding new Settlement and Term Sheet (3.5).	3.50	5,530.00
3/9/2022	Shifer, Joseph A.	Prepare for (0.3) and attend hearing re settlement (4.4).	4.70	5,616.50
3/9/2022	Schinfeld, Seth F.	Review C. Gange summary of March 9, 2022 hearing on settlement term sheet approval motion.	0.10	119.50
3/9/2022	Gange, Caroline	Attend hearing on settlement motion (4.4); review replies in support of settlement (0.9).	5.30	5,883.00
3/9/2022	Kelly, Declan	Prepare chart of objections for oral argument (1.2); review Debtors reply, UCC Statement, related filings (1.2); attend settlement hearing (4.4); draft summary of hearing, (1.3).	8.10	6,358.50



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### Litigation

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/10/2022	Blabey, David E.	Review individual victims' appellate brief and cases therein (2.4); further research for response to individual victims and outline points for brief (4.0).	6.40	7,776.00
3/10/2022	Gange, Caroline	Attend victims' statement hearing and emails w/ KL team re same.	2.80	3,108.00
3/10/2022	Kelly, Declan	Review settlement order (0.3).	0.30	235.50
3/11/2022	Blabey, David E.	Outline response to personal injury claimants' appellate arguments.	3.30	4,009.50
3/11/2022	Kelly, Declan	Research re appellate issues (4.7), email D. Blabey re: same (0.2).	4.90	3,846.50
3/12/2022	Blabey, David E.	Review appellees briefs.	1.00	1,215.00
3/13/2022	Blabey, David E.	Further review of appellees briefs (5.0); review and comment on summary of briefs to clients (0.2).	5.20	6,318.00
3/13/2022	Kelly, Declan	Draft update re: appeal filings (1.9), emails w. D. Blabey, C. Gange re: same (0.2).	2.10	1,648.50
3/14/2022	Blabey, David E.	Call with Robbins Russell team re briefing (0.5); review UST brief and case law cited therein (6.6).	7.10	8,626.50
3/14/2022	Kelly, Declan	Review appellate filings (0.2).	0.20	157.00
3/14/2022	Gange, Caroline	Attend call w/ D. Blabey and Robins Russell re reply brief (0.5); review appellee briefs re same/prep for reply (2.2).	2.70	2,997.00



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### Litigation

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/15/2022	Blabey, David E.	Draft personal injury section of appellate brief (8.5).	8.50	10,327.50
3/16/2022	Blabey, David E.	Draft due process section of Second Circuit brief.	3.50	4,252.50
3/16/2022	Eckstein, Kenneth H.	Conf w/ D. Blabey re appeal (0.4).	0.40	674.00
3/16/2022	Kelly, Declan	Review relevant appellate deadlines (0.4).	0.40	314.00
3/16/2022	Gange, Caroline	Emails w/ KL team re second circuit brief (0.2); fact research re same (1.1).	1.30	1,443.00
3/16/2022	Kane, Wendy	Emails w/ KL team re reply brief and final brief and review page proof brief for heading issue.	0.20	96.00
3/17/2022	Blabey, David E.	Draft appellate reply brief.	4.00	4,860.00
3/17/2022	Gange, Caroline	Emails w/ Gilbert re insurance adversary doc review.	0.20	222.00
3/17/2022	Kelly, Declan	Research re: notice, due process (5.3), email to D. Blabey re: same (0.3).	5.60	4,396.00
3/18/2022	Blabey, David E.	Edits to brief to incorporate Robbins Russell sections (1.3); review filed amicus briefs (0.3).	1.60	1,944.00
3/18/2022	Kelly, Declan	Review appellate filings, including: motions to file amicus briefs and amicus briefs (2.5).	2.50	1,962.50
3/21/2022	Wagner, Jonathan M.	Review draft reply brief on appeal.	0.50	750.00



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# **Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/21/2022	Blabey, David E.	Review draft preliminary statement (0.5); multiple emails with KL team re edits to brief and circulation to AHC (0.5).	1.00	1,215.00
3/21/2022	Eckstein, Kenneth H.	Revise appellate brief (1.8).	1.80	3,033.00
3/21/2022	Kelly, Declan	Review UST brief, pull cite for draft reply brief (0.5); summarize amicus brief (1.0).	1.50	1,177.50
3/21/2022	Gange, Caroline	Review and edit draft brief (2.5); multiple emails w/ D. Blabey and W. Kane re same (0.2); review joint appendix (0.5); review amicus briefs (1.4).	4.60	5,106.00
3/21/2022	Kane, Wendy	Review docket and compile amicus briefs; email C. Gange re same.	0.20	96.00
3/22/2022	Wagner, Jonathan M.	Review draft reply brief.	0.30	450.00
3/22/2022	Eckstein, Kenneth H.	Review motion re further mediation, correspond with clients re same (0.8).	0.80	1,348.00
3/22/2022	Blabey, David E.	Edits to appellate brief and emails with R. Englert, clients, and C. Gange re same (2.2); further edits to brief (0.2).	2.40	2,916.00
3/22/2022	Eckstein, Kenneth H.	Review appellate brief and correspond re same (1.4).	1.40	2,359.00
3/22/2022	Kelly, Declan	Review draft reply brief (1.2); review docket, email to C. Gange re: oral argument scheduling (0.2).	1.40	1,099.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/22/2022	Gange, Caroline	Review and incorporate Robbins Russell edits to brief (1.6); further review/revise same (2.9); emails w/ KL team re same (0.3); review draft joint appendix (0.2).	5.00	5,550.00
3/22/2022	Kane, Wendy	Review docket and compile prose briefs; email C. Gange re same (0.2).	0.20	96.00
3/23/2022	Blabey, David E.	Proof and edit reply brief (1.5) and call with K. Eckstein re same (0.2); review Debtor and UCC draft briefs (0.4); call and email with Debtors re brief (0.2); review emails concerning edits to brief (0.4); call with D. Kelly and emails re same re edits to brief (0.2); consider edits to brief suggested by Akin Gump (0.4).	3.30	4,009.50
3/23/2022	Eckstein, Kenneth H.	Prep for (1.0) and attend Judge Drain court hearing (0.5); review and comment on appeal brief, call re same (1.5).	3.00	5,055.00
3/23/2022	Gange, Caroline	Attend omnibus hearing re preliminary injunction and HRT motion (0.5); email w/ K. Eckstein re same (0.1); review and edit reply brief (2.8); emails w/ KL team re same (0.3).	3.70	4,107.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/23/2022	Kelly, Declan	Insert special appendix cites into draft brief (0.2); cite check draft brief (2.7); review appellate procedural deadlines, email to D. Blabey re: oral argument statement (0.2); call w. D. Blabey re: reply cite edits (0.2); revise draft reply brief (0.6), email to team re same (0.1); make further revisions to brief (0.2).	4.20	3,297.00
3/23/2022	Kane, Wendy	Emails w/ KL team and Counsel Press re reply brief; review cover re same.	0.20	96.00
3/24/2022	Wagner, Jonathan M.	Review appeal briefs.	1.00	1,500.00
3/24/2022	Blabey, David E.	Edits to appellate reply brief (3.0); calls and emails with M. Huebner re same (0.2); multiple emails with D. Kelly, C. Gange and W. Kane re brief (0.6); review other appellate reply briefs (0.3).	4.10	4,981.50
3/24/2022	Eckstein, Kenneth H.	Work on draft reply, calls and correspond re same (2.0); review draft briefs from others, comment (1.4).	3.40	5,729.00
3/24/2022	Kelly, Declan	Review final draft brief (1.6); review Drain decision re: stat. authority (0.2); final revisions to final draft brief (0.4); review page proof brief (0.2); summarize appellant replies (1.3); draft oral argument statement (0.2).	3.90	3,061.50
3/24/2022	Gange, Caroline	Further review and revise brief (2.0); multiple emails w/ KL team re same (0.3); review final brief for filing (0.5); review as-filed reply briefs (1.0).	3.80	4,218.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/24/2022	Kane, Wendy	Emails w/ KL team re reply brief (0.2); prepare table of authorities re same (0.5); proof reply brief and prepare for filing (0.4); emails w/ Counsel Press re same (0.3).	1.40	672.00
3/25/2022	Blabey, David E.	Call with K. Eckstein, R. Englert, and L. Robbins re oral argument (0.6); multiple emails with KL team re same (0.6).	1.20	1,458.00
3/25/2022	Eckstein, Kenneth H.	Call with R. Ringer, D. Blabey re oral argument (0.8); call with M. Huebner re appeal and other case issues (0.7); call with A. Preis re same (0.4).	1.90	3,201.50
3/25/2022	Gange, Caroline	Coordinate filing of acknowledgment/request for oral argument (1.1); calls/email w/ Robins Russell re same (0.3); emails w/ KL team re same (0.1); review reply briefs (2.6).	4.10	4,551.00
3/25/2022	Kelly, Declan	Draft reply brief chart (3.0); finalize oral argument statement, notice of hearing date acknowledgment, emails w. D. Blabey, R. Englert re: same (0.3).	3.30	2,590.50





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**Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/25/2022	Kane, Wendy	Emails w/ KL team re final briefs and oral argument statement (0.1); compile reply briefs (0.2); call w/ court re filing of notice of hearing date acknowledgment (0.1); call w/ S. Ford re same (0.1); prepare certificates of service for filings (0.4); prepare oral argument statement and notice for filing under R. Englert's name (0.3); emails w/ C. Gange and D. Kelly re same (0.3); revise certificates of service (0.2); file and serve oral argument statement and notice (1.3).	3.00	1,440.00
3/27/2022	Kelly, Declan	Review final appellate brief appendix cites (1.5), emails w. W. Kane re: same (0.2).	1.70	1,334.50
3/27/2022	Kane, Wendy	Download joint appendix volumes (0.5); review brief and insert joint appendix citations (0.9); emails w/ D. Kelly re same (0.2); email D. Blabey re same (0.1).	1.70	816.00
3/28/2022	Blabey, David E.	Review final briefs for filing and emails w/ KL team re same (0.6); exchange multiple emails regarding oral argument with KL team, Debtors and UCC (0.7).	1.30	1,579.50
3/28/2022	Eckstein, Kenneth H.	Calls re Second Circuit appeal, review briefs, call with M. Huebner, A. Preis (2.5).	2.50	4,212.50



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/28/2022	Kelly, Declan	Finalize Purdue brief record cites (1.2); review MSGE briefs, oral argument at district court for statutory arguments (0.9), emails w. D. Blabey, K. Eckstein re: same (0.2).	2.30	1,805.50
3/28/2022	Gange, Caroline	Review final brief (0.3); emails w/ D. Blabey and W. Kane re same (0.1); call w/ Gilbert re same (0.2).	0.60	666.00
3/28/2022	Kane, Wendy	Emails w/ KL team and Counsel Press re final briefs (0.3); review cover sheets to same (0.1); double-check record cites in briefs and revise same (0.6); prepare redlines re same (0.2); review tables and page numbering in briefs (0.4); finalize briefs for filing (0.5).	2.10	1,008.00
3/29/2022	Blabey, David E.	Call with Debtors, UCC and AHC advisors re oral argument (0.9).	0.90	1,093.50
3/29/2022	Eckstein, Kenneth H.	Call with DPW, Akin, KL re appeal (1.2); call with Gilbert re insurance motions (0.6).	1.80	3,033.00
3/30/2022	Eckstein, Kenneth H.	Call w/ A. Preis re business plan, appeal (0.4); call with M. Huebner, A. Preis re same (0.4); review and correspond re appeal and oral argument (0.8).	1.60	2,696.00
<b>TOTAL</b>			<b>284.10</b>	<b>\$327,472.00</b>



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	10.90	\$13,243.50
Eckstein, Kenneth H.	Partner	17.90	30,161.50
Fisher, David J.	Partner	5.30	8,374.00
Lenson, Todd E.	Partner	0.50	825.00
Ringer, Rachael L.	Partner	6.40	8,416.00
Rogoff, Adam C.	Partner	2.40	3,732.00
Rosenbaum, Jordan M.	Partner	4.90	6,860.00
Wagner, Jonathan M.	Partner	0.80	1,200.00
Stoopack, Helayne O.	Counsel	4.00	4,960.00
Shifer, Joseph A.	Spec Counsel	5.20	6,214.00
Taub, Jeffrey	Spec Counsel	3.50	4,182.50
Gange, Caroline	Associate	12.80	14,208.00
Kelly, Declan	Associate	6.20	4,867.00
Schinfeld, Seth F.	Associate	0.60	717.00
<b>TOTAL FEES</b>		<b>81.40</b>	<b>\$107,960.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/1/2022	Rogoff, Adam C.	Participate in AHG status call.	1.10	\$1,710.50



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/1/2022	Rosenbaum, Jordan M.	Attend call with AHC.	1.10	1,540.00
3/1/2022	Wagner, Jonathan M.	Attend portion of Committee call re settlement status.	0.80	1,200.00
3/1/2022	Fisher, David J.	Attend Ad Hoc Committee meeting.	1.00	1,580.00
3/1/2022	Blabey, David E.	Attend Ad Hoc Committee call regarding proposed Sackler settlement.	1.10	1,336.50
3/1/2022	Ringer, Rachael L.	Coordinate re: confidentiality parameters for AHC call, attend AHC call (1.8).	1.80	2,367.00
3/1/2022	Eckstein, Kenneth H.	Prep for (0.1) and attend AHC call re re mediation (1.1).	1.20	2,022.00
3/1/2022	Stoopack, Helayne O.	Prep for (0.1) and attend AHC call (1.1).	1.20	1,488.00
3/1/2022	Taub, Jeffrey	Attend call w/ AHC and advisors re mediation update.	1.10	1,314.50
3/1/2022	Shifer, Joseph A.	Attend AHC call re proposed settlement.	1.00	1,195.00
3/1/2022	Schinfeld, Seth F.	Attend portions of call with AHC members re: mediation update.	0.60	717.00
3/1/2022	Kelly, Declan	Attend AHC meeting re settlement (1.1).	1.10	863.50
3/2/2022	Rosenbaum, Jordan M.	Attend meeting with AHC.	0.70	980.00
3/2/2022	Fisher, David J.	Attend weekly Ad Hoc Committee conference call.	1.50	2,370.00
3/2/2022	Blabey, David E.	Attend weekly ad hoc Committee call.	1.50	1,822.50



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/2/2022	Lenson, Todd E.	Attend AHC weekly call re update.	0.50	825.00
3/2/2022	Ringer, Rachael L.	Emails w/ AHC re: term sheet motion and order/settlement (0.8), attend AHC call (1.5), attend portion of hearing (0.4).	2.70	3,550.50
3/2/2022	Eckstein, Kenneth H.	Attend AHC call re mediation (1.5).	1.50	2,527.50
3/2/2022	Shifer, Joseph A.	Attend portion of weekly AHC call (0.3).	0.30	358.50
3/2/2022	Gange, Caroline	Draft multiple updates re mediation, preliminary injunction and next steps (0.6); attend weekly AHC call (1.3).	1.90	2,109.00
3/2/2022	Kelly, Declan	Attend weekly AHC call (1.5).	1.50	1,177.50
3/3/2022	Blabey, David E.	Attend working group call.	0.70	850.50
3/3/2022	Ringer, Rachael L.	Attend portion of working group call re: updates (0.4).	0.40	526.00
3/3/2022	Eckstein, Kenneth H.	Attend Working Group call (0.7); follow-up call w/ clients re next steps (1.7).	2.40	4,044.00
3/4/2022	Rosenbaum, Jordan M.	Attend call with AHC.	1.60	2,240.00
3/4/2022	Blabey, David E.	Attend working group call re objection to settlement (0.7); attend full AHC call re same (1.7).	2.40	2,916.00
3/4/2022	Fisher, David J.	Attend portion of Ad Hoc Committee status conference call.	1.30	2,054.00



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/4/2022	Rogoff, Adam C.	Participate in portion of AHG call (1.3).	1.30	2,021.50
3/4/2022	Eckstein, Kenneth H.	Attend Working Group call (0.7); prep for (0.1) and attend AHC call (1.7).	2.50	4,212.50
3/4/2022	Stoopack, Helayne O.	Attend AHC call (1.6).	1.60	1,984.00
3/4/2022	Taub, Jeffrey	Attend portion of call w/ AHC and advisors re settlement.	1.30	1,553.50
3/4/2022	Shifer, Joseph A.	Attend AHC call (1.7).	1.70	2,031.50
3/4/2022	Gange, Caroline	Attend AHC meeting re settlement (1.7); attend working group pre-call re same (0.7); draft AHC updates re responses to settlement (0.1).	2.50	2,775.00
3/4/2022	Kelly, Declan	Attend AHC call (1.7).	1.70	1,334.50
3/7/2022	Rosenbaum, Jordan M.	Attend portion of call with AHC.	1.00	1,400.00
3/7/2022	Fisher, David J.	Attend portion of Ad Hoc Committee conference call regarding Settlement and Objection.	1.00	1,580.00
3/7/2022	Ringer, Rachael L.	Attend AHC meeting (1.0), call re: NOAT TDPs (0.5).	1.50	1,972.50
3/7/2022	Blabey, David E.	Attend AHC call the response to the motion (1.3).	1.30	1,579.50
3/7/2022	Eckstein, Kenneth H.	Attend AHC meeting re motion to approve supplement (1.4).	1.40	2,359.00
3/7/2022	Stoopack, Helayne O.	Attend AHC meeting (1.2).	1.20	1,488.00



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/7/2022	Taub, Jeffrey	Attend portion of call w/ AHC and AHC advisors re settlement term sheet and limited objection.	1.10	1,314.50
3/7/2022	Gange, Caroline	Attend AHC meeting re term sheet motion and next steps (1.4); prep for same (0.2); draft AHC updates (0.4).	2.00	2,220.00
3/7/2022	Kelly, Declan	Attend portion of AHC call (1.3).	1.30	1,020.50
3/8/2022	Blabey, David E.	Attend working group call (1.0).	1.00	1,215.00
3/8/2022	Eckstein, Kenneth H.	Attend Working Group call re objections, settlement options, prep for hearing (2.5).	2.50	4,212.50
3/8/2022	Shifer, Joseph A.	Attend working group call (1.2).	1.20	1,434.00
3/8/2022	Gange, Caroline	Draft and circulate AHC emails re objections to settlement motion and hearing re same.	0.40	444.00
3/9/2022	Blabey, David E.	Prep for (0.3) and attend call with working group to prep for hearing on Sackler settlement motion (1.5).	1.80	2,187.00
3/9/2022	Eckstein, Kenneth H.	Attend Working Group call to prep for hearing (1.5).	1.50	2,527.50
3/9/2022	Gange, Caroline	Attend portion of pre-hearing working group call (1.1); draft and edit summary update re settlement hearing (0.6); emails w/ D. Blabey and D. Kelly re same (0.1).	1.80	1,998.00
3/10/2022	Blabey, David E.	Attend portion of working group call (0.3).	0.30	364.50
3/10/2022	Eckstein, Kenneth H.	Attend Working Group call (0.6).	0.60	1,011.00



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/11/2022	Gange, Caroline	Draft AHC update re PI extension and review motion re same.	0.50	555.00
3/14/2022	Gange, Caroline	Edits to AHC update email re Second Circuit briefs.	0.20	222.00
3/15/2022	Blabey, David E.	Attend working group call (0.2).	0.20	243.00
3/21/2022	Gange, Caroline	Draft and circulate AHC update re amicus briefs.	0.90	999.00
3/22/2022	Eckstein, Kenneth H.	Attend Working Group call (0.7).	0.70	1,179.50
3/23/2022	Rosenbaum, Jordan M.	Attend portion of call with AHC.	0.50	700.00
3/23/2022	Fisher, David J.	Attend portion of Ad Hoc Committee meeting.	0.50	790.00
3/23/2022	Eckstein, Kenneth H.	Attend Working Group call re additional mediation, appeal, business plan (0.9); prep for and lead AHC call (1.1).	2.00	3,370.00
3/23/2022	Shifer, Joseph A.	Attend AHC call.	1.00	1,195.00
3/23/2022	Gange, Caroline	Attend weekly AHC call.	1.10	1,221.00
3/23/2022	Gange, Caroline	Draft hearing update for AHC and circulate to D. Blabey.	0.30	333.00
3/23/2022	Kelly, Declan	Attend AHC call (0.6).	0.60	471.00
3/25/2022	Gange, Caroline	Review/edit/finalize reply brief summary chart for circulation to D. Blabey (0.6); draft email re AHC fees (0.2).	0.80	888.00
3/28/2022	Gange, Caroline	Circulate update re reply briefs (0.1); email w/ D. Blabey re same (0.1).	0.20	222.00





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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/29/2022	Blabey, David E.	Attend portion of working group call (0.6).	0.60	729.00
3/29/2022	Eckstein, Kenneth H.	Attend Working Group call (0.8).	0.80	1,348.00
3/30/2022	Gange, Caroline	Draft AHC update email re Second Circuit.	0.20	222.00
3/31/2022	Eckstein, Kenneth H.	Attend Working Group call (0.8).	0.80	1,348.00
<b>TOTAL</b>			<b>81.40</b>	<b>\$107,960.50</b>



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**Plan and Disclosure Statement**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	33.20	\$55,942.00
Fisher, David J.	Partner	39.50	62,410.00
Reshtick, Abraham	Partner	1.50	2,100.00
Ringer, Rachael L.	Partner	2.70	3,550.50
Rogoff, Adam C.	Partner	0.50	777.50
Rosenbaum, Jordan M.	Partner	10.60	14,840.00
Stoopack, Helayne O.	Counsel	10.60	13,144.00
Taub, Jeffrey	Spec Counsel	1.10	1,314.50
Daniels, Elan	Associate	0.40	478.00
Gange, Caroline	Associate	2.90	3,219.00
Kelly, Declan	Associate	0.60	471.00
Khvatskaya, Mariya	Associate	6.30	7,182.00
Klegon, Matthew	Associate	3.90	4,446.00
Pistilli, Lia	Associate	3.90	4,446.00
<b>TOTAL FEES</b>		<b>117.70</b>	<b>\$174,320.50</b>



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**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/1/2022	Eckstein, Kenneth H.	Call with M. Huebner re mediation (0.8); follow up calls after AHC call with J. Chapman, M. Huebner, S. Gilbert, J. Peacock, J. Guard re mediation (3.0).	3.80	\$6,403.00
3/1/2022	Fisher, David J.	Review Settlement Agreement regarding provisions in anticipation of new terms regarding nonconsenting states.	0.70	1,106.00
3/1/2022	Daniels, Elan	Review confirmation order, related orders and email correspondence with D. Blabey regarding same (0.4).	0.40	478.00
3/2/2022	Rogoff, Adam C.	Emails with C. Gange re status and settlement; review proposed settlement.	0.40	622.00
3/2/2022	Rosenbaum, Jordan M.	Call w/ professionals re Mundipharma (0.9); review of plan documents (0.3).	1.20	1,680.00
3/2/2022	Eckstein, Kenneth H.	Call with J. Chapman, S. Gilbert (1.0); call with J. Chapman re mediation(0.8); review term sheet(1.6); call with G. Uzzi re same (0.3); call with co-counsel re same (1.8); emails w/ professionals re same re term sheet (0.8); call with S. Burian re same (0.5).	6.80	11,458.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/2/2022	Fisher, David J.	Conference call with Debevoise, FAs and representatives from IACs regarding IAC sales process and business update (1.0); follow up with Houlihan and FTI regarding next steps and discussions of IAC process (0.4); review proposed Settlement Term Sheet; review existing Settlement Agreement; preliminary discussions regarding same (1.4); communications with D. Blabey regarding Settlement Agreement and certain Plan provisions regarding amendments to Settlement Agreement (0.4).	3.20	5,056.00
3/2/2022	Gange, Caroline	Review mediators report (0.4); emails w/ KL team re same (0.2); review updates term sheets (1.0).	1.60	1,776.00
3/3/2022	Rosenbaum, Jordan M.	Call with HL and FTI re IACs.	0.60	840.00
3/3/2022	Ringer, Rachael L.	Attend portions of call with K. Eckstein and D. Blabey re: next steps for plan/settlement (0.5).	0.50	657.50
3/3/2022	Fisher, David J.	Call with Houlihan Lokey, FTI and Brown Rudnick regarding IAC sale process, new Settlement Term Sheet and impact on Settlement Agreement and Collateral (0.7); review mediator's report and new Settlement Term Sheet; review of existing Settlement Agreement (1.3); communications with K. Eckstein and R. Ringer regarding new Settlement Agreement; update call with Debevoise regarding IAC business update (0.6).	2.60	4,108.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/3/2022	Eckstein, Kenneth H.	Calls and discussions throughout day w/ all parties re mediation, settlement and motion (1.6), review and comment re term sheet (1.2), address confidentiality issues w/ KL team (0.6), call and correspond with Judge Chapman, M. Huebner (1.6); call and correspond with D. Fisher others re settlement agreement, collateral package, other amendments (1.3).	6.30	10,615.50
3/3/2022	Taub, Jeffrey	Call w/ KL corporate team and financial advisors re collateral and settlement term sheet (0.6); review term sheet and related filings (0.5).	1.10	1,314.50
3/3/2022	Kelly, Declan	Review mediator report (0.3).	0.30	235.50
3/4/2022	Rogoff, Adam C.	Emails with C. Gange re status and settlement (0.1).	0.10	155.50
3/4/2022	Rosenbaum, Jordan M.	Review of documents.	1.60	2,240.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/4/2022	Fisher, David J.	Review and comment on valuation slide deck prepared by FTI regarding new Settlement Agreement; communications with FTI and Houlihan regarding same (0.8); conference call with K. Eckstein, FTI, Houlihan, Brown Rudnick and KL regarding new Settlement Agreement and outstanding issues, including collateral (0.6); communications with Davis Polk regarding new settlement documents and process; email exchanges regarding same (0.4); review draft of ICA from Davis Polk; review of existing MDT Settlement Agreement; preparation of issues list regarding same (5.3); conference call with Brown Rudnick and Akin Gump regarding discussion of ICA draft and issues list; revise same (1.5); email exchanges with Davis Polk regarding issues list and next steps (0.4); call with BR and Akin re ICA structure (0.4).	9.40	14,852.00
3/4/2022	Eckstein, Kenneth H.	Call with FTI and HL re settlement analysis (0.7).	0.70	1,179.50
3/4/2022	Ringer, Rachael L.	Call with KL team, Gilbert, and Gary/Devon re: issues with plan settlement (0.5), attend AHC call (1.1).	1.60	2,104.00
3/4/2022	Stoopack, Helayne O.	Review draft Intercreditor Agreement (2.2); review mediator report and term sheet (1.3).	3.50	4,340.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/4/2022	Klegon, Matthew	Review interim report (0.4); and term sheet (0.5).	0.90	1,026.00
3/4/2022	Pistilli, Lia	Review/analysis of settlement agreement terms.	0.70	798.00
3/5/2022	Rosenbaum, Jordan M.	Prepare for (0.3) and attend call with Akin and DPW and Brown Rudnick (1.5).	1.80	2,520.00
3/5/2022	Fisher, David J.	Prepare for conference call with Davis Polk; review ICA, Settlement Agreement and issues list (1.3); conference call with Davis Polk, Brown Rudnick, Akin Gump and KL team to discuss ICA and comments and process on SOAF (1.5); follow-up discussions with Brown Rudnick and Akin Gump (0.5); email exchanges with K. Eckstein and R. Ringer regarding process and status (0.3); preliminary review of SOAF (0.6).	4.20	6,636.00
3/5/2022	Klegon, Matthew	Review correspondence.	0.10	114.00
3/6/2022	Rosenbaum, Jordan M.	Review of transaction documents.	1.50	2,100.00
3/6/2022	Fisher, David J.	Review revised Settlement Agreement and Direct Agreements with SOAF; communications with Davis Polk (1.2); communications with M. Klegon and L. Pistilli regarding review of documents and new Settlement Agreement (0.6).	1.80	2,844.00



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**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/6/2022	Eckstein, Kenneth H.	Review and revise draft AHC response, call with D. Blabey re same, call with S. Gilbert re same (3.0).	3.00	5,055.00
3/6/2022	Klegon, Matthew	Prepare issues list re settlement agreements and related term sheet.	2.90	3,306.00
3/6/2022	Pistilli, Lia	Review/analysis of settlement agreement terms (1.6); draft settlement agreements (1.2); draft related correspondence re: issues raised (0.4).	3.20	3,648.00
3/7/2022	Rosenbaum, Jordan M.	Review of transaction documents (0.3); call with BR and Akin (1.3).	1.60	2,240.00
3/7/2022	Fisher, David J.	Review draft CTA and Intercreditor Agreement, Direct Settlement Agreement and revised MDT Settlement Agreement (3.8); conference call with Akin Gump and Brown Rudnick regarding same (1.3); calls with Davis Polk regarding status of documents (0.4); review issues list in preparation for call (0.3).	5.80	9,164.00
3/8/2022	Rosenbaum, Jordan M.	Review of transaction documents.	0.20	280.00





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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/8/2022	Fisher, David J.	Review MDT Settlement Agreement (proposal revisions), CTA, SOAF Direct Agreement; communications with Akin Gump and Brown Rudnick regarding issues (2.2); communications with Davis Polk regarding issues on revised Settlement documents (0.4); communications with FTI regarding comments; review of comments regarding same (0.6).	3.20	5,056.00
3/8/2022	Eckstein, Kenneth H.	Review and finalize AHC pleading, calls re same (2.0).	2.00	3,370.00
3/8/2022	Ringer, Rachael L.	Review/edit portions of settlement response (0.4), discussion with D. Blabey re: same (0.2).	0.60	789.00
3/9/2022	Rosenbaum, Jordan M.	Call with FTI (0.5).	0.50	700.00
3/9/2022	Fisher, David J.	Attend conference call with FTI and Brown Rudnick to discuss revisions to MDT Settlement Agreement and prepare for same (0.7); communications with Davis Polk regarding SOAF documents and related settlement documents (0.4).	1.10	1,738.00
3/10/2022	Fisher, David J.	Communications with Davis Polk and Brown Rudnick regarding SOAF Settlement and related documents (0.9); review comments and issues regarding same (0.5).	1.40	2,212.00
3/10/2022	Eckstein, Kenneth H.	Review order and materials re supplemental agreement (0.8); follow up calls re same (0.5).	1.30	2,190.50



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**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/11/2022	Fisher, David J.	Multiple communications with Davis Polk, Brown Rudnick, Akin Gump KL regarding status of SOAF Settlement documents (0.9); review same and issues (0.4).	1.30	2,054.00
3/15/2022	Rosenbaum, Jordan M.	Review of transaction documents.	0.40	560.00
3/15/2022	Fisher, David J.	Communications with Davis Polk regarding status of SOAF and related documents (0.3); preliminary review of SOAF Direct Agreement (0.5).	0.80	1,264.00
3/15/2022	Gange, Caroline	Review plan provisions (1.0); calls/emails w/ J. Shifer re same (0.3).	1.30	1,443.00
3/16/2022	Rosenbaum, Jordan M.	Review of transaction documents.	0.80	1,120.00
3/16/2022	Fisher, David J.	Review SOAF Agreement and email regarding issues; communications with Brown Rudnick and Akin Gump regarding same (1.3); email exchanges with J. Rosenbaum regarding issues on SOAF Direct Agreement (0.2); review existing MDTST and draft of ICA in light of SOAF Agreement (0.5).	2.00	3,160.00
3/16/2022	Stoopack, Helayne O.	Review draft of NOAT Tax Matters Agreement (0.6); review Brown Rudnick mark-up of same (1.3); call w/ M. Khvatskaya, B. Kelly, N. Bouchard re: same (0.5).	2.40	2,976.00
3/16/2022	Khvatskaya, Mariya	Call w/ tax team re: status of case and recent developments.	0.90	1,026.00



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**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/17/2022	Rosenbaum, Jordan M.	Call with Akin and Brown Rudnick re: plan issues/next steps.	0.40	560.00
3/17/2022	Eckstein, Kenneth H.	Correspond with S. Gilbert (0.3); A. Preis (0.2); M. Huebner (0.3) re settlement and plan issues.	0.80	1,348.00
3/17/2022	Fisher, David J.	Review SOAF Settlement Agreement and preparation of issues for discussion (0.8); call with Brown Rudnick and Akin Gump regarding document and next steps (0.6).	1.40	2,212.00
3/17/2022	Reshtick, Abraham	Discussion with tax team re: plan issues and review of related materials.	0.50	700.00
3/17/2022	Stoopack, Helayne O.	Call with DPW, B. Rudnick, NRF tax re: NOAT TMA.	1.20	1,488.00
3/17/2022	Khvatskaya, Mariya	Call with Sackler counsel re: TMA (1.2); review TMA (0.5); discuss status of case and transition to A. Reshtick (0.5).	2.20	2,508.00
3/18/2022	Eckstein, Kenneth H.	Call with S. Gilbert re update and prep for UCC call (0.4); call with A. Preis, M. Atkinson, S. Gilbert re Plan B and case issues, follow up re same (1.2); review draft Circuit reply, comment (1.3).	2.90	4,886.50
3/21/2022	Eckstein, Kenneth H.	Correspond with M. Huebner, others re mediation (0.8).	0.80	1,348.00
3/23/2022	Fisher, David J.	Review SOAF Settlement Agreement, outstanding issues and comments.	0.60	948.00
3/23/2022	Eckstein, Kenneth H.	Call with M. Huebner re mediation (0.4).	0.40	674.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/24/2022	Stoopack, Helayne O.	Review and mark revised draft of NOAT TMA.	1.60	1,984.00
3/28/2022	Eckstein, Kenneth H.	Correspond w/ Debtors re business plan and case issues (0.7).	0.70	1,179.50
3/28/2022	Khvatskaya, Mariya	Draft summary of status of case and outstanding tax issues.	0.60	684.00
3/29/2022	Eckstein, Kenneth H.	Call with A. Preis re case issues (0.5); correspond with HL, J. Peacock re business plan (0.4).	0.90	1,516.50
3/29/2022	Reshtick, Abraham	Continue review of restructuring related materials and summary overview from tax associate.	1.00	1,400.00
3/29/2022	Kelly, Declan	Review mediation order (0.3).	0.30	235.50
3/29/2022	Khvatskaya, Mariya	Review and revise TMA.	0.90	1,026.00
3/30/2022	Eckstein, Kenneth H.	Call w/ clients re mediation issues (0.4); discussion re NewCo issues (0.4).	0.80	1,348.00
3/30/2022	Stoopack, Helayne O.	Review revised draft of TMA.	0.50	620.00
3/30/2022	Khvatskaya, Mariya	Review revised TMA.	0.20	228.00
3/31/2022	Eckstein, Kenneth H.	Correspond with M. Huebner, A. Preis re appeal and oral argument (1.2); correspond re pro se mediation (0.8).	2.00	3,370.00
3/31/2022	Stoopack, Helayne O.	Attend Brown Rudnick, DPW, KL tax call (0.2); revise NOAT TMA draft (1.2).	1.40	1,736.00
3/31/2022	Khvatskaya, Mariya	Call with DPW and BR tax re: TMA (0.3); revise TMA (1.2).	1.50	1,710.00



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**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
TOTAL			117.70	\$174,320.50

**Kramer Levin**



May 16, 2022

Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

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**FOR PROFESSIONAL SERVICES rendered through April 30, 2022.**

Fees	\$411,393.50
Less 50% Discount on Non-Working Travel mtr	(3,080.00)
Fee Subtotal	408,313.50
Disbursements and Other Charges	6,826.64
<b>TOTAL BALANCE DUE</b>	<b>\$415,140.14</b>

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas, New York, NY 10036  
T 212.715.9100 F 212.715.8000



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**MATTER SUMMARY**

**For professional services rendered through April 30, 2022 in connection with the following matters:**

<b>Matter</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Disbs</b>	<b>Total</b>
072952-00001	Asset Analysis and Recovery	\$0.00	\$6,826.64	<b>\$6,826.64</b>
072952-00003	Business Operations	49,124.50	0.00	<b>49,124.50</b>
072952-00004	Case Administration	339.00	0.00	<b>339.00</b>
072952-00006	Employment and Fee Applications	8,245.50	0.00	<b>8,245.50</b>
072952-00008	Litigation	240,584.50	0.00	<b>240,584.50</b>
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	36,565.00	0.00	<b>36,565.00</b>
072952-00010	Non-Working Travel	6,160.00	0.00	<b>6,160.00</b>
072952-00011	Plan and Disclosure Statement	70,375.00	0.00	<b>70,375.00</b>
<b>Subtotal</b>		<b>411,393.50</b>	<b>6,826.64</b>	<b>418,220.14</b>
Less 50% Discount on Non-Working Travel matter				<b>(3,080.00)</b>
<b>TOTAL CURRENT INVOICE</b>				<b>\$415,140.14</b>



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**Asset Analysis and Recovery**

**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Courier Services	\$25.19
Data Hosting Charges	2,100.69
Photocopying	146.90
Printing & Binding	4,236.06
Telecommunication Charges	88.94
Transcript Fees	121.20
Westlaw Online Research	107.66
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$6,826.64</b>

<b>TOTAL</b>	<b>\$6,826.64</b>
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**Business Operations**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Caplan, Jonathan S.	Partner	3.60	\$5,130.00
Eckstein, Kenneth H.	Partner	2.00	3,370.00
Fisher, David J.	Partner	6.80	10,744.00
Rosenbaum, Jordan M.	Partner	2.80	3,920.00
Colucci, Marcus	Spec Counsel	11.30	13,729.50
Taub, Jeffrey	Spec Counsel	6.10	7,289.50
Gange, Caroline	Associate	1.00	1,110.00
Kelly, Declan	Associate	1.10	863.50
Ortega-Rodriguez, Sealtiel	Associate	1.40	1,099.00
Tirado, Carlos J.	Associate	2.10	1,869.00
<b>TOTAL FEES</b>		<b>38.20</b>	<b>\$49,124.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/1/2022	Fisher, David J.	Correspondence with J. Rosenbaum regarding business issues (0.1); review emails and Settlement Agreement regarding same (0.5).	0.60	\$948.00



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**Business Operations**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/1/2022	Eckstein, Kenneth H.	Call with company, UCC, AHC advisors re Avrio and other Call with company, UCC, AHC advisors re business plan issues (1.0).	1.00	1,685.00
4/1/2022	Taub, Jeffrey	E-mail w/ J. Rosenbaum re business issues.	0.20	239.00
4/4/2022	Caplan, Jonathan S.	Review IP update and follow-up re same with M. Colucci.	0.50	712.50
4/4/2022	Eckstein, Kenneth H.	Call with HL re business plan (1.0).	1.00	1,685.00
4/4/2022	Taub, Jeffrey	Review settlement agreement, NewCo LLC Agreement and ancillary documents re business plan (1.5), draft summary of same (0.6); review workstream checklist and IP term sheets re same (0.5), call w/ M. Colucci re same (0.3).	2.90	3,465.50
4/4/2022	Colucci, Marcus	Review draft agreements related to business plan (3.8); review data room re same (0.7); call w/ J. Taub re same (0.3).	4.80	5,832.00
4/4/2022	Tirado, Carlos J.	Conduct research issuers business issues.	2.10	1,869.00
4/5/2022	Taub, Jeffrey	Correspondence w/ J. Rosenbaum re business issues, coordinate call w/ financial advisors re same.	0.60	717.00



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**Business Operations**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/6/2022	Fisher, David J.	Conference call with Houlihan Lokey and FTI to discuss business plan and review slide deck (0.8); follow up corporate workstream call with A. Resnick and J. Rosenbaum (0.3); review business plan (0.4).	1.50	2,370.00
4/6/2022	Taub, Jeffrey	Call w/ J. Rosenbaum and D. Fisher re business plan (0.3); prepare for and attend call w/ KL Tax, Bankruptcy and Corporate teams re case status (0.6); prepare for, attend and follow up from call with KL, FTI and HL teams re business plan (0.7); follow-up call w/ KL Corporate and KL Tax teams re same (0.3).	1.90	2,270.50
4/7/2022	Rosenbaum, Jordan M.	Call with DPW re business plan.	0.60	840.00
4/7/2022	Fisher, David J.	Review Settlement Agreement and business issues in advance of call with Davis Polk (0.2); call with Davis Polk and J. Rosenbaum regarding re related issues and status (0.6).	0.80	1,264.00
4/12/2022	Rosenbaum, Jordan M.	Review of business plan.	0.30	420.00
4/12/2022	Fisher, David J.	Review materials for business issues (0.5).	0.50	790.00
4/12/2022	Ortega-Rodriguez, Sealtiel	Meet with IP review team re: assignments to review (0.5) and began reviewing assignment agreements (0.9).	1.40	1,099.00
4/13/2022	Rosenbaum, Jordan M.	Call with DPW, FTI, HL regarding IP matters.	0.90	1,260.00



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**Business Operations**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/13/2022	Caplan, Jonathan S.	Prepare for and participate in IP diligence call (0.5); follow-up with KL team re same, next steps (1.2).	1.70	2,422.50
4/13/2022	Fisher, David J.	Review various checklists in preparation of conference call (0.5); review documents regarding business and IP issues; conference call with IP teams and Davis Polk regarding same; post call discussion of same with J. Rosenbaum and FTI (1.4).	1.90	3,002.00
4/13/2022	Colucci, Marcus	Analyze draft IP agreements (2.4); conference call with Davis Polk regarding draft IP agreements (0.5).	2.90	3,523.50
4/14/2022	Rosenbaum, Jordan M.	Call with FTI and HL re business issues (0.4); Attend call with DPW and Davis Polk (0.6).	1.00	1,400.00
4/14/2022	Caplan, Jonathan S.	Prepare for and conduct call with KL, HL and FTI team re IP issues (0.5); follow-up re same (0.9).	1.40	1,995.00
4/14/2022	Fisher, David J.	Follow up phone call with Houlihan Lokey and FTI regarding business issues (0.4); follow up correspondence with J. Rosenbaum re same (0.3).	0.70	1,106.00
4/14/2022	Taub, Jeffrey	Attend call w/ KL team, HL and FTI re business issues and next steps.	0.50	597.50
4/14/2022	Colucci, Marcus	Analyze license agreements and discuss IP rights with KL team.	1.60	1,944.00
4/15/2022	Fisher, David J.	Communications with FTI regarding business issues (0.8).	0.80	1,264.00



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**Business Operations**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/20/2022	Colucci, Marcus	Draft summary and correspond with KL team regarding business plan rights (1.7); follow-up with Davis Polk regarding same (0.3).	2.00	2,430.00
4/28/2022	Kelly, Declan	Summarize KEIP/KERP Motion (1.1).	1.10	863.50
4/28/2022	Gange, Caroline	Review KEIP/KERP motion and prepare update re same.	1.00	1,110.00
<b>TOTAL</b>			<b>38.20</b>	<b>\$49,124.50</b>



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**Case Administration**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	0.20	\$243.00
Kane, Wendy	Paralegal	0.20	96.00
<b>TOTAL FEES</b>		<b>0.40</b>	<b>\$339.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/13/2022	Blabey, David E.	Call and email with A. Preis re Robbins Russell re scheduling.	0.20	\$243.00
4/26/2022	Kane, Wendy	Register KL team for omnibus/PI hearing; email C. Gange re same.	0.20	96.00
<b>TOTAL</b>			<b>0.40</b>	<b>\$339.00</b>



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**Employment and Fee Applications**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Ringer, Rachael L.	Partner	0.30	\$394.50
Gange, Caroline	Associate	5.30	5,883.00
Kane, Wendy	Paralegal	4.10	1,968.00
<b>TOTAL FEES</b>		<b>9.70</b>	<b>\$8,245.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/1/2022	Gange, Caroline	Edit and finalize February fee statement for filing.	0.60	\$666.00
4/1/2022	Kane, Wendy	Prepare KL February fee statement for filing; email C. Gange re same; file and serve fee statement.	0.40	192.00
4/5/2022	Gange, Caroline	Review and revise AHC professional fee statements and coordinate filing re same.	0.50	555.00
4/7/2022	Kane, Wendy	Review March fee statement for compliance with UST guidelines and local rules (1.9); file Gilbert fee statement and email P. Holland re same (0.3).	2.20	1,056.00
4/8/2022	Ringer, Rachael L.	Coordinate with K. Eckstein and D. Blabey re: review of fees (0.3).	0.30	394.50
4/11/2022	Kane, Wendy	Review revised fee statement and email C. Gange re same.	0.40	192.00



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**Employment and Fee Applications**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/12/2022	Kane, Wendy	File and serve FTI twenty-ninth monthly fee statement.	0.20	96.00
4/19/2022	Gange, Caroline	Review report and respond to fee examiner re 7th interim fee application.	1.10	1,221.00
4/21/2022	Gange, Caroline	Review/finalize fee examiner response and emails w/ fee examiner re same.	0.80	888.00
4/25/2022	Gange, Caroline	Review March fee statement for privilege/confidentiality and compliance with UST guidelines.	1.10	1,221.00
4/26/2022	Gange, Caroline	Review March fee statement for privilege/confidentiality and compliance with UST guidelines.	1.20	1,332.00
4/27/2022	Kane, Wendy	Revise fee statement per G. Gange comments.	0.30	144.00
4/28/2022	Kane, Wendy	Prepare March fee statement and exhibits.	0.60	288.00
<b>TOTAL</b>			<b>9.70</b>	<b>\$8,245.50</b>





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**Litigation**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	28.80	\$34,991.50
Eckstein, Kenneth H.	Partner	40.40	68,074.00
Englert, Jr., Roy T.	Partner	71.70	110,418.00
Ringer, Rachael L.	Partner	2.30	3,024.50
Wagner, Jonathan M.	Partner	1.90	2,850.00
Shifer, Joseph A.	Spec Counsel	4.70	5,616.50
Andrews, Lauren Cassady	Associate	1.90	1,976.00
Ferguson, Zachary N.	Associate	1.90	1,833.50
Gange, Caroline	Associate	3.90	4,329.00
Kelly, Declan	Associate	7.50	5,887.50
Kane, Wendy	Paralegal	3.30	1,584.00
<b>TOTAL FEES</b>		<b>168.30</b>	<b>\$240,584.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/4/2022	Englert, Jr., Roy T.	Conference call with Debtors' counsel and other appellant counsel to discuss oral argument (0.9), and call w/ K. Eckstein and D. Blabey re same (0.5).	1.40	\$2,156.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/4/2022	Blabey, David E.	Call with K. Eckstein and R. Englert re oral argument (0.5); review J. Shifer draft of tolling extension (0.1); emails re tolling agreement with co-defendant (0.4).	1.00	1,215.00
4/4/2022	Eckstein, Kenneth H.	Call with D. Blabey, R. Englert re oral argument (0.5); call with M. Huebner re same (0.7); call with C. Shore re oral argument (0.7); follow up correspondence w/ KL team re circuit argument (0.5); review case pleadings and materials (1.0).	3.40	5,729.00
4/4/2022	Shifer, Joseph A.	Draft Abbott tolling stip (0.6), email D. Blabey re same (0.1).	0.70	836.50
4/5/2022	Eckstein, Kenneth H.	Call with M. Huebner, A. Preis re oral argument (0.5); call with appellants re oral argument (1.5); call with S. Gilbert re case issues (0.5).	2.50	4,212.50
4/5/2022	Blabey, David E.	Attend portion of call with co-appellants to discuss oral argument and division of labor/time (1.0); emails re tolling stip with co-defendant (0.2).	1.20	1,458.00
4/5/2022	Englert, Jr., Roy T.	Attend conference call among counsel for all appellants re oral argument.	1.40	2,156.00
4/5/2022	Shifer, Joseph A.	Emails with DPW/Akin re Abbott tolling stip, (0.2); revisions to same (0.4).	0.60	717.00
4/6/2022	Blabey, David E.	Emails re tolling agreement with co-defendant.	0.10	121.50



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/6/2022	Eckstein, Kenneth H.	Call and correspond w/ KL and appellant counsel re appeal issues and allocation of argument (0.8).	0.80	1,348.00
4/6/2022	Shifer, Joseph A.	Emails with Kirkland, DPW, and Akin re Abbott tolling (0.3), revisions to same (0.4).	0.70	836.50
4/7/2022	Eckstein, Kenneth H.	Review and edit oral argument outline (1.2).	1.20	2,022.00
4/7/2022	Blabey, David E.	Exchange emails w/ co-appellants re oral argument.	0.20	243.00
4/7/2022	Englert, Jr., Roy T.	Call with M. Tobak of Davis Polk re oral argument.	0.50	770.00
4/7/2022	Shifer, Joseph A.	Emails with D. Blabey, D. Gremling, Kirkland, DPW, and Akin re Abbott tolling (0.2), revisions to same (0.3).	0.50	597.50
4/8/2022	Englert, Jr., Roy T.	Coordinate with KL associates to prepare for oral argument.	1.00	1,540.00
4/8/2022	Shifer, Joseph A.	Emails with Kirkland, DPW, and Akin re Abbott tolling (0.3), revisions to same (0.5).	0.80	956.00
4/8/2022	Andrews, Lauren Cassady	Draft and review correspondence re oral argument preparation.	0.10	104.00
4/10/2022	Eckstein, Kenneth H.	Correspondence with R. Englert re argument (0.4).	0.40	674.00
4/11/2022	Blabey, David E.	Emails re extension of tolling agreement with co-defendant.	0.10	121.50
4/12/2022	Englert, Jr., Roy T.	Call with M. Kesselman re moot court and follow-up.	0.90	1,386.00



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# **Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/12/2022	Blabey, David E.	Call with K. Eckstein re oral argument (0.4) and email to R. Englert re same (0.4).	0.80	972.00
4/12/2022	Eckstein, Kenneth H.	Correspond w/ co-appellants re oral argument (0.4); call w/ D. Blabey re same (0.4); review injunction motion (0.4).	1.20	2,022.00
4/12/2022	Andrews, Lauren Cassady	Draft and review correspondence re oral argument preparation.	0.60	624.00
4/13/2022	Englert, Jr., Roy T.	Call w/ moot court participants re preparation (0.4); call w/ K. Eckstein and D. Blabey re same (0.3); review briefs in preparation for same (1.7).	2.40	3,696.00
4/13/2022	Blabey, David E.	Call with K. Eckstein and R. Englert re oral argument (0.3); review draft motion to extend preliminary injunction (0.4) and emails with C. Gange re same (0.2).	0.90	1,093.00
4/13/2022	Andrews, Lauren Cassady	Draft and review correspondence re oral argument preparation. Review briefs in preparation for R. Englert's oral argument.	0.70	728.00
4/14/2022	Eckstein, Kenneth H.	Call with D. Blabey re oral argument (0.3); correspond with M. Huebner re same (0.3); review briefs in prep for moot court (1.7).	2.30	3,875.50
4/14/2022	Blabey, David E.	Call with K. Eckstein re oral argument.	0.30	364.50
4/15/2022	Englert, Jr., Roy T.	Prepare for oral argument.	5.00	7,700.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/15/2022	Blabey, David E.	Emails with K. Eckstein, R. Englert, and DPW re oral argument.	0.30	364.50
4/18/2022	Englert, Jr., Roy T.	Oral argument preparation, including review of amicus briefs and brief of Canadian appellees.	4.90	7,546.00
4/18/2022	Blabey, David E.	Email to R. Englert re topics to be covered at oral argument (2.5); emails w/ KL team re preliminary injunction motion and AHC response (0.2).	2.70	3,280.50
4/19/2022	Englert, Jr., Roy T.	Oral argument preparation (8.4); call w/ K. Eckstein re same (0.6).	9.00	13,860.00
4/19/2022	Eckstein, Kenneth H.	Call with R. Englert re oral argument (0.6); review outline for argument (0.2); call w/ D. Blabey and R. Ringer re same (0.3).	1.10	1,853.50
4/19/2022	Blabey, David E.	Call with K. Eckstein and R. Ringer re oral argument (0.3); review Levitin article and email to R. Englert re same (0.8); review and comment on R. Englert script for oral argument (0.7).	1.80	2,187.00
4/19/2022	Ringer, Rachael L.	Attend call re: oral argument prep (0.3).	0.30	394.50
4/19/2022	Kelly, Declan	Review Canadian Creditors Second Circuit brief and respond to D. Blabey questions (0.3).	0.30	235.50
4/20/2022	Wagner, Jonathan M.	Review report concerning status of preliminary injunction motion, appeal.	0.10	150.00
4/20/2022	Eckstein, Kenneth H.	Correspond with DPW re argument, time allocation (0.5).	0.50	842.50



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/20/2022	Englert, Jr., Roy T.	Revise oral argument outline (1.9); prepare for oral argument including communications with Davis Polk necessary to allow filing of motion to reallocate time for oral argument (1.5).	3.40	5,236.00
4/21/2022	Eckstein, Kenneth H.	Review materials re oral argument/prep for moot court (1.4).	1.40	2,359.00
4/21/2022	Englert, Jr., Roy T.	Prepare for oral argument, including revising argument outline and reviewing Second Circuit panel assignment.	7.90	12,166.00
4/21/2022	Blabey, David E.	Multiple emails with K. Eckstein, R. Englert and C. Gange re Second Circuit panel assignment (0.6); review info and previous decisions by the three panelists (1.6).	2.20	2,673.00
4/21/2022	Gange, Caroline	Emails w/ KL team re oral argument panel.	0.30	333.00
4/22/2022	Englert, Jr., Roy T.	Prepare for oral argument.	4.00	6,160.00
4/25/2022	Englert, Jr., Roy T.	Prepare for oral argument (7.0); discussions w/ Davis Polk re same (1.1).	8.10	12,474.00
4/25/2022	Eckstein, Kenneth H.	Review and edit oral argument outline (3.5); call with A. Preis re argument (0.4); call with D. Blabey re moot court (0.5).	4.40	7,414.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/25/2022	Blabey, David E.	Review all Second Circuit briefs in prep for moot court and oral argument (6.1); call with K. Eckstein re prep for moot court (0.5); draft questions for moot court (1.3).	7.90	9,598.50
4/25/2022	Kelly, Declan	Research local rules, review acknowledgment of hearing statement (0.8); emails w/ W. Kane, D. Blabey re: filing hearing acknowledgment (0.2); review hearing acknowledgment form (0.2).	1.20	942.00
4/25/2022	Andrews, Lauren Cassady	Draft and review correspondence re oral argument preparation.	0.20	208.00
4/25/2022	Kane, Wendy	Emails w/ D. Kelly re notice of acknowledgment of hearing date and review docket re same (0.2); prepare notice with updated information (0.3); file and service of same (1.6).	2.10	1,008.00
4/26/2022	Englert, Jr., Roy T.	Attend moot court at Davis Polk (4.5) and follow-up preparation for oral argument (3.0).	7.50	11,550.00
4/26/2022	Eckstein, Kenneth H.	Attend omnibus hearing (2.0); prepare for oral argument (3.5).	5.50	9,267.50
4/26/2022	Blabey, David E.	Multiple emails and calls re script for Second Circuit argument (0.6); attend portions of moot court (3.6); emails with clients re script (0.2).	4.40	5,346.00
4/26/2022	Kelly, Declan	Draft electronic device request letter (0.8), emails w. S. Ford, W. Kane, D. Blabey re: same (0.7).	1.50	1,177.50



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/26/2022	Kane, Wendy	Emails w/ D. Kelly and S. Ford re electronic device letter (0.2); prepare same for filing (0.5).	0.70	336.00
4/27/2022	Englert, Jr., Roy T.	Prepare for oral argument.	1.50	2,310.00
4/27/2022	Blabey, David E.	Attend omnibus hearing re PI extension, fees, and other matters.	2.00	2,430.00
4/27/2022	Eckstein, Kenneth H.	Prepare for oral argument (5.5).	5.50	9,267.50
4/27/2022	Kelly, Declan	Attend portions of omnibus hearing (1.7); revise electronic request letter (0.4).	2.10	1,648.50
4/27/2022	Gange, Caroline	Attend portions of hearing re PI and fees.	0.70	777.00
4/27/2022	Gange, Caroline	Emails w/ D. Blabey re oral argument prep.	0.30	333.00
4/27/2022	Kane, Wendy	Prepare cert of service re electronic device letter; email S. Ford re same; file same.	0.40	192.00
4/28/2022	Englert, Jr., Roy T.	Prepare for oral argument.	8.10	12,474.00
4/28/2022	Blabey, David E.	Emails with K. Eckstein, R. Englert and C. Gange re prep for Second Circuit argument and comments to hearing notes.	0.40	486.00
4/28/2022	Eckstein, Kenneth H.	Calls and correspond/ co-appellant re oral argument (1.4), review materials and prep for argument (1.6).	3.00	5,055.00
4/28/2022	Andrews, Lauren Cassidy	Draft and review correspondence with R. Englert re oral argument.	0.30	312.00





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### Litigation

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/29/2022	Wagner, Jonathan M.	Attend portions of oral argument.	1.80	2,700.00
4/29/2022	Ringer, Rachael L.	Attend portions of second circuit argument re: plan (2.0).	2.00	2,630.00
4/29/2022	Blabey, David E.	Attend Second Circuit oral argument (2.3); call with K. Eckstein to discuss argument (0.2).	2.50	3,037.50
4/29/2022	Eckstein, Kenneth H.	Attend Second Circuit hearing (5.0); follow up with R. Englert (0.8); review client memo, comment (0.6); calls w/ co-appellants re same (0.8).	7.20	12,132.00
4/29/2022	Englert, Jr., Roy T.	Final preparation and arguing case. Discuss case with co-counsel after argument.	4.70	7,238.00
4/29/2022	Shifer, Joseph A.	Monitor portions of second circuit argument.	1.40	1,673.00
4/29/2022	Ferguson, Zachary N.	Listen to portions of 2d Cir. oral argument.	1.90	1,833.50
4/29/2022	Kelly, Declan	Attend Second Circuit oral argument and take notes (2.4).	2.40	1,884.00
4/29/2022	Gange, Caroline	Attend oral argument (2.4); calls and emails w/ KL team and AHC professionals re same (0.2).	2.60	2,886.00
4/29/2022	Kane, Wendy	Obtain second circuit briefs and email C. Gange re same.	0.10	48.00
<b>TOTAL</b>			<b>168.30</b>	<b>\$240,584.50</b>



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	8.10	\$9,841.50
Eckstein, Kenneth H.	Partner	7.00	11,795.00
Englert, Jr., Roy T.	Partner	0.40	616.00
Fisher, David J.	Partner	1.30	2,054.00
Ringer, Rachael L.	Partner	1.20	1,578.00
Rosenbaum, Jordan M.	Partner	1.20	1,680.00
Taub, Jeffrey	Spec Counsel	0.50	597.50
Gange, Caroline	Associate	4.60	5,106.00
Kelly, Declan	Associate	4.20	3,297.00
<b>TOTAL FEES</b>		<b>28.50</b>	<b>\$36,565.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/1/2022	Eckstein, Kenneth H.	Call with certain AHC members re Pro Se mediation, NOAT issues (0.5).	0.50	\$842.50
4/5/2022	Eckstein, Kenneth H.	Attend Working Group call (0.8).	0.80	1,348.00
4/6/2022	Rosenbaum, Jordan M.	Attend weekly call with AHC.	0.50	700.00
4/6/2022	Fisher, David J.	Attend weekly Ad Hoc Committee meeting.	0.50	790.00



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/6/2022	Eckstein, Kenneth H.	Prep for (0.3) and lead AHC call (0.5).	0.80	1,348.00
4/6/2022	Taub, Jeffrey	Attend weekly Committee status call.	0.50	597.50
4/6/2022	Kelly, Declan	Prep for (0.1) and attend AHC call (0.5).	0.60	471.00
4/6/2022	Gange, Caroline	Prep for (0.1) and attend weekly AHC call (0.5); edit client update emails (0.6).	1.20	1,332.00
4/7/2022	Blabey, David E.	Attend portion of working group call.	0.30	364.50
4/7/2022	Eckstein, Kenneth H.	Attend Working Group call (0.7).	0.70	1,179.50
4/8/2022	Blabey, David E.	Emails with client re UST brief.	0.20	243.00
4/8/2022	Gange, Caroline	Emails w/ AHC call re 2nd Circuit briefing.	0.20	222.00
4/12/2022	Ringer, Rachael L.	Attend working group call (0.5).	0.50	657.50
4/12/2022	Blabey, David E.	Attend working group call.	0.50	607.50
4/12/2022	Eckstein, Kenneth H.	Prep for (0.1) and attend Working Group call (0.5).	0.60	1,011.00
4/13/2022	Rosenbaum, Jordan M.	Attend portion of weekly call with AHC.	0.30	420.00
4/13/2022	Fisher, David J.	AHG weekly AHC meeting.	0.40	632.00
4/13/2022	Blabey, David E.	Attend portion of weekly AHC call (0.3); email to working group re oral argument (0.5).	0.80	972.00
4/13/2022	Gange, Caroline	Draft AHC update email re PI extension (0.3); attend weekly AHC call (0.4).	0.70	777.00



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/14/2022	Englert, Jr., Roy T.	Attend portion of Working Group conference call.	0.40	616.00
4/14/2022	Blabey, David E.	Attend portions of working group call.	0.30	364.50
4/14/2022	Eckstein, Kenneth H.	Attend Working Group call (0.7).	0.70	1,179.50
4/14/2022	Gange, Caroline	Review PI motion and draft/circulate AHC update email re same.	0.50	555.00
4/19/2022	Ringer, Rachael L.	Attend working group call (0.7).	0.70	920.50
4/19/2022	Eckstein, Kenneth H.	Attend Working Group call (0.7).	0.70	1,179.50
4/19/2022	Blabey, David E.	Attend portions of working group call (0.2); multiple emails with clients and co-counsel re preliminary injunction extension (0.6); email to full AHC re recommendation on same (0.4); call with clients and R. Englert to prep for argument (0.7); draft update to full AHC re appeal issues (0.8).	2.70	3,280.50
4/20/2022	Eckstein, Kenneth H.	Attend call with Working Group re oral argument (1.0).	1.00	1,685.00
4/26/2022	Blabey, David E.	Attend portions of working group call.	0.20	243.00
4/26/2022	Eckstein, Kenneth H.	Attend Working Group call (0.5).	0.50	842.50
4/27/2022	Rosenbaum, Jordan M.	Attend call with AHC.	0.40	560.00
4/27/2022	Fisher, David J.	Attend weekly AHC call.	0.40	632.00
4/27/2022	Blabey, David E.	Exchange emails with clients re Second Circuit argument notes.	0.30	364.50



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**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/27/2022	Eckstein, Kenneth H.	Prep for (0.3) and attend AHC weekly call (0.4).	0.70	1,179.50
4/27/2022	Gange, Caroline	Draft AHC email re PI extension (0.2); attend weekly AHC call (0.4).	0.60	666.00
4/27/2022	Kelly, Declan	Attend AHC call (0.4).	0.40	314.00
4/29/2022	Blabey, David E.	Multiple emails with C. Gange and D. Kelly re summary of argument (0.5); emails with K. Eckstein and R. Englert re same (0.5); draft and edit summary update to clients (1.8).	2.80	3,402.00
4/29/2022	Gange, Caroline	Multiple calls/emails w/ AHC clients re oral argument (0.5); review/draft portions of/edit client summary re same (0.9).	1.40	1,554.00
4/29/2022	Kelly, Declan	Draft oral argument summary (2.3); review oral argument summary (0.5); call w/ D. Blabey re: oral argument summary (0.1); review final update, email to D. Blabey re: same (0.3).	3.20	2,512.00
<b>TOTAL</b>			<b>28.50</b>	<b>\$36,565.00</b>



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**Non-Working Travel**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Englert, Jr., Roy T.	Partner	4.00	\$6,160.00
<b>TOTAL FEES</b>		<b>4.00</b>	<b>\$6,160.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/29/2022	Englert, Jr., Roy T.	Return travel from NY to DC after argument.	4.00	\$6,160.00
<b>TOTAL</b>			<b>4.00</b>	<b>\$6,160.00</b>



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**Plan and Disclosure Statement**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Bessonette, John	Partner	0.80	\$1,140.00
Caplan, Jonathan S.	Partner	2.40	3,420.00
Eckstein, Kenneth H.	Partner	6.70	11,289.50
Fisher, David J.	Partner	8.10	12,798.00
Lenson, Todd E.	Partner	0.80	1,320.00
Reshtick, Abraham	Partner	7.00	9,800.00
Ringer, Rachael L.	Partner	1.50	1,972.50
Rosenbaum, Jordan M.	Partner	7.50	10,500.00
Stoopack, Helayne O.	Counsel	2.90	3,596.00
Gange, Caroline	Associate	0.60	666.00
Khvatskaya, Mariya	Associate	7.90	9,006.00
Ortega-Rodriguez, Sealtiel	Associate	6.20	4,867.00
<b>TOTAL FEES</b>		<b>52.40</b>	<b>\$70,375.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/1/2022	Rosenbaum, Jordan M.	Call with HL and FTI re plan issues (0.4); review of plan documents (1.9).	2.30	\$3,220.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/1/2022	Eckstein, Kenneth H.	Call with Judge Chapman re mediation issues (0.7); pre call with HL, and FTI re same (0.4); correspond with M. Huebner, A. Preis re oral argument and appeal issues, call re same (1.2).	2.30	3,875.50
4/1/2022	Reshtick, Abraham	Continue analysis of restructuring materials and related tax analysis.	0.90	1,260.00
4/1/2022	Stoopack, Helayne O.	Review of tax matters.	0.50	620.00
4/1/2022	Khvatskaya, Mariya	Review revisions to tax matters agreement.	0.60	684.00
4/3/2022	Eckstein, Kenneth H.	Review case and plan materials (1.0); correspond w/ KL team re same (0.5).	1.50	2,527.50
4/4/2022	Rosenbaum, Jordan M.	Review of plan documents regarding dispositions.	1.00	1,400.00
4/4/2022	Ringer, Rachael L.	Attend portions of call re tax issues w/ K. Eckstein, A. Reshtick, C. Gange, M. Khvatskaya (0.5).	0.50	657.50
4/4/2022	Eckstein, Kenneth H.	Call re tax issues for Knoa and MDT w/ A. Reshtick, R. Ringer, H. Stoopack, C. Gange, M. Khvatskaya (0.6).	0.60	1,011.00
4/4/2022	Stoopack, Helayne O.	Call with A. Reshtick, M. Khvatskaya, K. Eckstein, R. Ringer, C. Gange re: status and tax issues (0.6); review DPW comments on NOAT Tax Matters Agreement (0.8).	1.40	1,736.00
4/4/2022	Khvatskaya, Mariya	Call with bankruptcy team re: tax issues (0.6); discuss outstanding tax issues w/ A. Reshtick (0.4).	1.00	1,140.00





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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/4/2022	Gange, Caroline	Attend call w/ K. Eckstein, R. Ringer, A. Reshtick re tax issues and next steps.	0.60	666.00
4/5/2022	Rosenbaum, Jordan M.	Review of plan documents.	0.20	280.00
4/5/2022	Stoopack, Helayne O.	Call w/ Brown Rudnick, Akin, DPW tax re: NOAT tax matters agreement (0.5); review revisions to same (0.5).	1.00	1,240.00
4/5/2022	Khvatskaya, Mariya	Attend tax calls with corporate and bankruptcy teams.	1.50	1,710.00
4/6/2022	Rosenbaum, Jordan M.	Review of transaction documents (0.8); call with HL and FTI (0.5); call with K. Eckstein and A. Reshtick re same (0.4).	1.70	2,380.00
4/6/2022	Fisher, David J.	Conference call with tax team, K. Eckstein, J. Taub and J. Rosenbaum to discuss tax analysis and corporate structure work (0.6); follow up with J. Rosenbaum (0.1).	0.70	1,106.00
4/6/2022	Eckstein, Kenneth H.	Call with tax team re case issues (0.6); review FTI/HL materials, correspond with HL, FTI re business plan issues (0.7).	1.30	2,190.50
4/6/2022	Reshtick, Abraham	Continue review of restructuring materials and related tax analysis (1.5); participate in calls with restructuring and corporate teams (0.7); call w/ T. Lenson re tax issues (0.3).	2.50	3,500.00
4/6/2022	Lenson, Todd E.	Call with HL re plan (0.5), call with A. Reshtick re tax issues (0.3).	0.80	1,320.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/6/2022	Bessonette, John	Call with KL team re status, structure and upcoming matters with respect to plan documents.	0.80	1,140.00
4/6/2022	Khvatskaya, Mariya	Call with corporate team re: current projects (0.8); review same (0.5).	1.30	1,482.00
4/7/2022	Ringer, Rachael L.	Call with B. Kelly, A. Reshtick re: tax/plan issues (1.0).	1.00	1,315.00
4/7/2022	Reshtick, Abraham	Continue review of restructuring materials and related tax analysis (1.0); call with tax co-counsel concerning case (0.5).	1.50	2,100.00
4/7/2022	Khvatskaya, Mariya	Call with DPW tax re: outstanding tax items (0.3); call with BR tax re: outstanding tax workstreams (0.9); review same (0.2).	1.40	1,596.00
4/8/2022	Rosenbaum, Jordan M.	Review of transaction documents.	0.30	420.00
4/8/2022	Caplan, Jonathan S.	Review and consider deal correspondence.	0.50	712.50
4/10/2022	Eckstein, Kenneth H.	Call with S. Gilbert re case/plan issues (0.6).	0.60	1,011.00
4/11/2022	Caplan, Jonathan S.	Review deal correspondence and additional materials from DPW.	0.40	570.00
4/12/2022	Fisher, David J.	Communications from Debevoise and materials regarding restructuring slides (0.3).	0.30	474.00
4/12/2022	Eckstein, Kenneth H.	Correspond with Judge Chapman re mediation; follow up re same (0.4).	0.40	674.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/13/2022	Fisher, David J.	Communications with Davis Polk regarding status of Settlement Agreement (0.3).	0.30	474.00
4/13/2022	Ortega-Rodriguez, Sealtiel	Review IP assignment documents (5.3), prepare summary for internal team (0.9).	6.20	4,867.00
4/14/2022	Fisher, David J.	Preparation for closing checklist workstream telephone call; review closing checklists; attendance on telephone call (1.2); follow up communications with Akin Gump and Brown Rudnick regarding issues and IAC restructuring matters (0.3).	1.50	2,370.00
4/14/2022	Reshtick, Abraham	Participate in tax call with debtor's counsel (0.5); follow up on outstanding tax items (0.8).	1.30	1,820.00
4/14/2022	Khvatskaya, Mariya	Call with BR and DPW re: TMA and tax issues.	0.70	798.00
4/15/2022	Rosenbaum, Jordan M.	Review of transaction documents.	0.20	280.00
4/15/2022	Fisher, David J.	Communications with Debevoise regarding foreign issues (0.3).	0.30	474.00
4/15/2022	Reshtick, Abraham	Follow up on tax and structuring analysis.	0.80	1,120.00
4/15/2022	Khvatskaya, Mariya	Draft outstanding tax issues list.	0.50	570.00
4/18/2022	Rosenbaum, Jordan M.	Review of transaction documents.	0.20	280.00



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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/18/2022	Fisher, David J.	Preliminary review of Sackler comments to MDT Settlement Agreement and draft received from Davis Polk (0.5); communications with J. Rosenbaum (0.2).	0.70	1,106.00
4/20/2022	Rosenbaum, Jordan M.	Review of plan documents (0.8); call with DPW and BR and Akin re same (0.6).	1.40	1,960.00
4/20/2022	Fisher, David J.	Review Sackler comments to MDT Settlement Agreement in preparation for call with Davis Polk and creditors; communications with Akin Gump and Brown Rudnick regarding same (1.2); call with Davis Polk, Brown Rudnick, Akin Gump and KL team to discuss Sackler comments (0.8); preliminary review of mark up to Collateral and Intercreditor Agreement (0.4).	2.40	3,792.00
4/20/2022	Caplan, Jonathan S.	Review deal correspondence from KL Team.	0.80	1,140.00
4/21/2022	Caplan, Jonathan S.	Review updated deal correspondence.	0.70	997.50
4/27/2022	Khvatskaya, Mariya	Call with Sacklers' counsel re: NOAT TMA.	0.90	1,026.00
4/28/2022	Rosenbaum, Jordan M.	Review of transaction documents.	0.20	280.00
4/28/2022	Fisher, David J.	Review comments/ emails from Akin, DTP and BR as to settlement agreement and Security/Pledge Doc comments.	0.60	948.00



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**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/29/2022	Fisher, David J.	Review SA (MDT), Intercreditor Agreement and email communications with Akin and Brown Rudnick regarding same.	1.30	2,054.00
<b>TOTAL</b>			<b>52.40</b>	<b>\$70,375.00</b>

**Exhibit G**

Budget and Staffing Plan

**BUDGET**

**February 1, 2022 – April 30, 2022**

	<b>PROJECT CATEGORY</b>	<b>HOURS BUDGETED</b>	<b>FEES BUDGETED</b>	<b>ACTUAL HOURS BILLED</b>	<b>ACTUAL FEES SOUGHT</b>
00001	Asset Analysis and Recovery	100	\$100,000	0.00	0.00
00003	Business Operations	300	\$300,000	45.20	\$59,575.50
00004	Case Administration	100	\$100,000	5.10	\$2,493.00
00006	Employment and Fee Applications	100	\$100,000	59.60	\$50,294.00
00008	Litigation	650	\$650,000	762.90	\$896,635.50
00009	Meetings and Communications with Ad-Hoc Committee & Creditors	500	\$500,000	162.50	\$216,679.00
00010	Non-Working Travel	0.00	\$0.00	4.00	\$3,080.00
00011	Plan and Disclosure Statement	3000	\$3,000,000	240.70	\$349,930.50
	<b>TOTAL</b>	<b>5000</b>	<b>\$5,000,000.00</b>	<b>1,280.00</b>	<b>1,578,687.50</b>

**STAFFING PLAN**

<b>Category of Timekeeper</b>	<b>Range of Hourly Rate</b>
Partner	\$1,050 - \$1,685
Counsel/Special Counsel	\$1,050 - \$1,660
Associate/Law Clerk	\$585 - \$1,195
Paralegal	\$270 - \$520

**EXHIBIT H**

Blended Hourly Rate Summary

**CUSTOMARY AND COMPARABLE COMPENSATION  
DISCLOSURES FOR THE EIGHTH INTERIM FEE PERIOD**

<b>TITLE</b>	<b>Non-Bankruptcy Blended Hourly Rate (\$) – FY21 (New York Office Only)</b>	<b>Committee Blended Hourly Rate in Application (\$)</b>
Partner	\$1,269	\$1,456
Counsel	\$1,190	\$1,240
Special Counsel	\$1,056	\$1,198
Associate/Law Clerk	\$875	\$976
Paralegal	\$404	\$480
<b>Aggregate Blended Rate</b>	<b>\$975</b>	<b>\$1,236</b>